

Joint Pretrial Order

State of Washington v. The GEO Group, Inc., No. 3:17-cv-05806-RJB

Nwauzor et al. v. The GEO Group, Inc., No. 3:17-cv-05769-RJB

United States District Court
for the Western District of Washington, Tacoma

Plaintiffs' Exhibits

*Exhibits below are jointly proposed by the State of Washington and Private Plaintiffs except where "Nwauzor Only" is indicated. If "Nwauzor Only" is indicated, the exhibit is proposed by Private Plaintiffs only.

Ex. #	Description	Authenticity	Admissibility	Objection	Admitted
1	6/21/2017 Email from James Black (with attachment) GEO-State 036415 – 036420	Stipulated	Stipulated		
2	GEO NWDC Policy and Procedure Manual- 5.1.2 Voluntary Work Program. Effective: 4/13/2015. GEO-State 003451-003458 Dep. Exhibit 2 30(b)(6) Kimble (Also Dep. Exhibit 313 Tracy)	Stipulated	Stipulated		
3	Detainee Job Descriptions- Cook/Prep/Server, Dishwasher/Pots & Pans, Laundry Worker GEO-State 015099-005101, GEO-State 003524 Dep. Exhibit 3 30(b)(6) Kimble	Stipulated	Stipulated		
4	Detainee Kitchen Worker Hygiene and Grooming Standards GEO-State 003519 Dep. Exhibit 4 30(b)(6) Kimble	Stipulated	Disputed	FRE 701, 802, F	

5	Kitchen Worker Orientation Packet GEO-State 003538-003556 Dep. Exhibit 5 30(b)(6) Kimble	Stipulated	Stipulated	C: (page 003556)	
6	Daily Work Crew Count Sheet – Blank Dep. Exhibit 6 30(b)(6) Kimble	Stipulated	Stipulated		
7	03-07-2018 GEO VWP Memo GEO-State 047868	Stipulated	Disputed	FRE 401/402, 701, 802, F	
8	NWDC Food Service Shift Tool Control GEO-State 003515-003516 Dep. Exhibit 8 30(b)(6) Kimble	Stipulated	Stipulated		
9	NWDC Offender Job/Program Assignments Dep. Exhibit 9 30(b)(6) Kimble	Stipulated	Disputed	FRE 402, 403, 701, 802, F	
10	Lieutenant in Tacoma, WA job posting WA00003531-3534	Stipulated	Disputed	FRE 402, 403, 701, 802, F	
11	City of Tacoma Certificate of Compliance Dep. Exhibit 11 30(b)(6) Kimble	Stipulated	Disputed	FRE 402, 403, 701, 802, F	
12	NWDC Housekeeping Plan GEO-State 000632-000635 Dep. Exhibit 12 30(b)(6) Kimble	Stipulated	Stipulated		
13	6/21/2017 Email from Steven Miskimens GEO-State 036785-036787	Stipulated	Stipulated		
14	4/12/2012 Memorandum from Classification to Associate Warden McHatton GEO-State 003477 Dep. Exhibit 14 30(b)(6) Kimble	Stipulated	Disputed	FRE 402, 403, 701, 802, F	

15	10/3/2014 Email from Bill McHatton to Alisha Singleton, Michael Heye GEO-State 012190 Dep. Exhibit 15 30(b)(6) Kimble (Also Dep. Exhibit 100 Singleton)	Stipulated	Disputed	FRE 402, 701, 802, F	
16	3/4/2014 Email from Bill McHatton to Lowell Clark GEO-State 006269-006270 Dep. Exhibit 16 30(b)(6) Kimble	Stipulated	Disputed	FRE 402, 701, 802, F	
17	PBNDS 2011 – 5.8 Voluntary Work Program Dep. Exhibit 17 30(b)(6) Kimble	Stipulated	Stipulated		
18	NWDC Facility History GEO-State 005744-005748 Dep. Exhibit 18 30(b)(6) Kimble	Stipulated	Disputed	FRE 402, 701, 802, F	
19	NWDC Detainee Handbook 2016 - Spanish - Unsigned GEO-State 242377-242419	Stipulated	Stipulated		
20	Chart of Hours Worked and Number of Workers GEO-State 019281 Dep. Exhibit 20 30(b)(6) Kimble	Stipulated	Disputed	FRE 402, 403, 701, 802, F	
21	Worker Pay Chart by Month GEO-State 019283 Dep. Exhibit 21 30(b)(6) Kimble	Stipulated	Disputed	FRE 402, 701, 802, F	
22	VWP Program Spend by Month 2006-2016 GEO-State 019286 (printed from .xls) Dep. Exhibit 22 30(b)(6) Kimble	Stipulated	Disputed	FRE 402, 701, 802, F	
23	Volunteer Work Program Agreement signed by Fernando Aguirre-Urbina. 10/24/17 Dep. Exhibit 23 Aguirre	Stipulated	Stipulated		
24	Detainee Signed VWP Agreement GEO-State 265131	Stipulated	Stipulated		
25	Laundry Photograph WA00030816	Stipulated	Disputed	FRE 402, 701, 802, F	

26	1-797 Notice of Action from U.S. Citizenship and Immigration Services approving the application for employment authorization of an individual detained in the Northwest Detention Center (NWDC) WA00003798	Stipulated	Disputed		
27	GEO NWDC Policy and Procedure Manual - 8.1.1-A: Food Service Operations, Effective: 4/13/2015 GEO-State 009340-009374 Dep. Exhibit 27 Henderson	Stipulated	Stipulated		
28	GEO Corporate Policy and Procedure Manual - 4.3.1: Food Service Management Procedure, Effective 4/18/14 GEO-State 009379-009381 Dep. Exhibit 28 Henderson	Stipulated	Stipulated		
29	PBNDS 2011 Revised 2016 4.1 Food Service Dep. Exhibit 29 Henderson	Stipulated	Stipulated		
30	Laundry Photograph WA00030742	Stipulated	Disputed	FRE 402, 701, 802, F	
31	Summary of Daily Briefing GEO-State 029341-029342 Dep. Exhibit 31 Henderson	Stipulated	Disputed	FRE 402, 701, 802, F	
32	2007 NWDC Year End Report GEO-State 029720-029740 Dep. Exhibit 32 Henderson	Stipulated	Stipulated		
33	2009 NWDC Year End Report GEO-State 029765-029785 Dep. Exhibit 33 Henderson	Stipulated	Stipulated		
34	2010 NWDC Year End Report GEO-State 029786-029806 Dep. Exhibit 34 Henderson	Stipulated	Stipulated		
35	2013 NWDC Year End Report GEO-State 029807-029833 Dep. Exhibit 35 Henderson	Stipulated	Stipulated		

36	2014 NWDC Year End Report GEO-State 029834-029859 Dep. Exhibit 36 Henderson	Stipulated	Stipulated		
37	GEO Group's Standards Compliance Checklist GEO-State 241855-241875 Dep. Exhibit 37 Henderson	Stipulated	Stipulated		
38	10/23/2012 Email from Chad Manuel to Lowell Clark GEO-State 039161-039162 Dep. Exhibit 38 Henderson	Stipulated	Disputed	FRE 701, 802, F	
39	5/25/2014 Email from Leonardo Jaramillo to Aaron Rotondo GEO-State 049433-049434 Dep. Exhibit 39 Henderson	Stipulated	Disputed	FRE 402, 403, 701, 802, F	
40	5/21/2016 Email from Marc Johnson to Leonardo Jaramillo GEO-State 242931-242932 Dep. Exhibit 40 Henderson	Stipulated	Disputed	FRE 403, 701, 802, F	
41	Food Cost Summary from 2015 GEO-State 027771-027803 Dep. Exhibit 41 Henderson	Stipulated	Stipulated		
42	Internal (Local) Food Service Supervisor GEO-State 019374-019376 Dep. Exhibit 42 Henderson	Stipulated	Stipulated		
43	Food Service Production Supervisor Job Description- April 2007 GEO-State 021123-021124 Dep. Exhibit 43 Henderson	Stipulated	Stipulated		
44	Internal/External Job Posting – Food Service Supervisor – March 2015 GEO-State 033048-03049 Dep. Exhibit 44 Henderson (Also Dep. Exhibit 300 Delacruz)	Stipulated	Stipulated		

45	GEO OJT for Cook Supervisor GEO-State 023592-023607 Dep. Exhibit 45 Henderson	Stipulated	Stipulated		
46	GEO's New Food Service Worker Training Manual. GEO-State 023864-023873 Dep. Exhibit 46 Henderson	Stipulated	Stipulated		
47	GEO's New Food Service Clerk Training Manual. 4/27/16 in State v. GEO. GEO-State 023568-023576 Dep. Exhibit 47 Henderson	Stipulated	Disputed	FRE 402, 701, 802, F	
48	Post Orders- Kitchen Officer Swing-2015 GEO-State 016065-016090 Dep. Exhibit 48 Henderson	Stipulated	Stipulated		
49	Photograph of Detainee Workers in the Kitchen GEO-State 048485-048490 Dep. Exhibit 49 Henderson	Stipulated	Disputed	FRE 402, 701, 802, F	
50	8/26/2016 Memorandum from Bertha Henderson GEO-State 048543-048550 Dep. Exhibit 50 Henderson	Stipulated	Stipulated		
51	5/31/2010 Outcount Sheet Lunch Pay Sheet GEO-State 109476 Dep. Exhibit 51 Henderson	Stipulated	Disputed	FRE 402, 701, 802, F	
52	8/26/2017 Email from Marc Johnson to Bertha Henderson GEO-State 242219-242220 Dep. Exhibit 52 Henderson	Stipulated	Stipulated		
53	Email from Nels Riach to Alisha Singleton, et al. Subject: kitchen worker UDC hearings. GEO-State 049409 Dep. Exhibit 53 Henderson	Stipulated	Stipulated		
54	NWDC Detainee Work Program Survey 022312.xls GEO-State 048542	Disputed	Disputed	FRE 701, 802, F	

55	5/31/2013 Email from Bertha Henderson to Lowell Clark GEO-State 238991-238992 Dep. Exhibit 55 Henderson	Stipulated	Disputed	FRE 402, 403, 701, 802, F	
56	2/16/2012 Email from Nels Riach to Alisha Singleton GEO-State 038178-038179 Dep. Exhibit 56 Henderson	Stipulated	Disputed	FRE 402, 403, 701, 802, F	
57	5/9/2013 Daily Detainee Worker Pay Sheets GEO-State 051384 Dep. Exhibit 57 Henderson	Stipulated	Disputed	FRE 403, 701, 802, F	
58	8/19/2010 Email from Bertha Henderson to Leroy Portillo GEO-State 039163-039164 Dep. Exhibit 58 Henderson	Stipulated	Stipulated		
59	2/8/2011 Email from Bertha Henderson to Leroy Portillo GEO-State 039171-039172 Dep. Exhibit 59 Henderson	Stipulated	Stipulated		
60	12/5/2011 Email from Chad Manuel to Bertha Henderson GEO-State 048893-048894 Dep. Exhibit 60 Henderson	Stipulated	Disputed	FRE 402, 403, 701, 802, F	
61	6/8/2009 Email from Kyle Schiller to James Black GEO-State 015831 Dep. Exhibit 61 Henderson	Stipulated	Disputed	FRE 701, 802, F	
62	11/25/2014 Email from Lowell Clark to Ryan Kimble GEO-State 036453-036455 Dep. Exhibit 62 Henderson Also Dep. Exhibit 193 Kimble	Stipulated	Disputed	FRE 402, 403, 701, 802, F	

63	Request for Staff Adjustment – 1/7/2013 GEO-State 044596-044601 Dep. Exhibit 63 Henderson	Stipulated	Disputed	FRE 402, 403, 701, 802, F	
64	Batch Listing – 12/07/2009 GEO-State 104171-104190 Dep. Exhibit 64 Henderson	Stipulated	Disputed	FRE 402, 701, 802, F	
65	Batch Listing - 12/21/2009 GEO-State 104477-104498 Dep. Exhibit 65 Henderson	Stipulated	Disputed	FRE 402, 701, 802, F	
66	Batch Listing – 01/04/2010 GEO-State 104702-104723 Dep. Exhibit 66 Henderson	Stipulated	Disputed	FRE 402, 701, 802, F	
67	Batch Listing – 03/01/2010 GEO-State 106357-106390 Dep. Exhibit 67 Henderson	Stipulated	Disputed	FRE 402, 701, 802, F	
68	Payroll Report – 5/24/2010 GEO-State 109183-109218 Dep. Exhibit 68 Henderson	Stipulated	Disputed	FRE 402, 701, 802, F	
69	06/14/2011 Department Head Meeting Minutes GEO-State 047504-07505 Dep. Exhibit 69 Henderson	Stipulated	Stipulated		
70	10/4/2012 Email from Bruce Scott to Carole Curry GEO-State 232270 Dep. Exhibit 70 Henderson	Stipulated	Disputed	FRE 402, 701, 802, F	
71	6/26/2012 Email from John Griffin to Bertha Henderson GEO-State 241374 Dep. Exhibit 71 Henderson	Stipulated	Disputed	FRE 402, 403, 701, 802, F	
72	Department Head Meeting Minutes GEO-State 243081-243082 Dep. Exhibit 72 Henderson	Stipulated	Stipulated		

73	4/13/2017 Email from David Tracy to Bertha Henderson GEO-State 027751-027752 Dep. Exhibit 73 Henderson	Stipulated	Disputed	FRE 402, 701, 802, F	
74	7/8/2014 Email from Jatinder Singh to Leroy Portillo GEO-State 006266-006228 Dep. Exhibit 74 Henderson	Stipulated	Disputed	FRE 402, 403, 701, 802, F	
75	6/7/2012 Memorandum from Sarjit Singh to Michelle Ziegwied, FSA Henderson GEO-State 021037 Dep. Exhibit 75 Henderson	Disputed	Disputed	FRE 402, 403, 701, 802, F	
76	6/27/2012 Email from John Griffin to Bertha Henderson GEO-State 227920 Dep. Exhibit 76 Henderson	Stipulated	Disputed	FRE 402, 403, 701, 802, F	
77	6/5/2008 Memorandum from Alisha Singleton GEO-State 018907-018908 Dep. Exhibit 77 Singleton	Stipulated	Disputed	FRE 402, 403 701, 802, F	
78	5/1/2012 Department Head Meeting Notes GEO-State 029337-029338 Dep. Exhibit 78 Singleton	Stipulated	Stipulated		
79	Interior Photograph WA00031102	Stipulated	Disputed	FRE 402, 701, 802, F	
80	Daily Detainee Worker Pay Sheet – Blank & G-4 Pod Roster for 6/14/17 (Singleton Ex. 80) GEO-State 038177, GEO-State 023021 Dep. Exhibit 80 Singleton	Stipulated	Disputed	FRE 402, 701, 802, F	
81	July 14, 2017 Pod Porters Rosters Pods A-F GEO-State 230007-230021 Dep. Exhibit 81 Singleton	Stipulated	Disputed	FRE 402, 701, 802, F	

82	3/1/2010 Email from Alisha Singleton to Shihpei Stevenson GEO-State 037256-037257 Dep. Exhibit 82 Singleton	Stipulated	Disputed	FRE 402, 701, 802, F	
83	Job Description- Cook/Prep/Server GEO-State 015099 Dep. Exhibit 83 Singleton	Stipulated	Stipulated		
84	Job Description- Dishwasher GEO-State 015100 Dep. Exhibit 84 Singleton	Stipulated	Stipulated		
85	Job Description – Laundry Worker GEO-State 020107 Dep. Exhibit 85 Singleton	Stipulated	Stipulated		
86	4.4.5 GEO NWDC Policy and Procedure Manual – Laundry Services, Effective 4/18/2014 GEO-State 048841-048843 Dep. Exhibit 86 Singleton	Stipulated	Stipulated		
87	Laundry Kite from 2017 GEO-State 242843 Dep. Exhibit 87 Singleton	Stipulated	Disputed	FRE 402, 701, 802, F	
88	Job Description – Barber GEO-State 019287 Dep. Exhibit 88 Singleton	Stipulated	Stipulated		
89	Job Description – Barber Cleaner GEO-State 019288 Dep. Exhibit 89 Singleton	Stipulated	Stipulated		
90	8/15/2006 Memorandum from Jose G. Moncivais Sr. to D/O Riley GEO-State 213729 Dep. Exhibit 90 Singleton	Stipulated	Disputed	FRE 402, 701, 802, F	
91	Job Description – Pod Porter GEO-State 036481-036482 Dep. Exhibit 91 Singleton	Stipulated	Stipulated		

92	3/26/2009 Email from Steve Hucke to Alisha Singleton GEO-State 023051-023052 Dep. Exhibit 92 Singleton	Stipulated	Disputed	FRE 402, 701, 802, F	
93	11/5/2012 Email from Alisha Singleton to Bill McHatton GEO-State 019324-019325 Dep. Exhibit 93 Singleton (Also Dep. Exhibit 320 Heye)	Stipulated	Disputed	FRE 402, 701, 802, F	
94	09/29/2006 Memorandum from Alisha Singleton to all pod officers GEO-State 036807-036808 Dep. Exhibit 94 Singleton	Stipulated	Disputed	FRE 402, 701, 802, F	
95	6/17/2005 Memorandum from Alisha Singleton to all supervisors & kitchen officers GEO-State 048703 Dep. Exhibit 95 Singleton	Stipulated	Disputed	FRE 402, 701, 802, F	
96	4/14/2005 Memorandum from Alisha Singleton to all kitchen officers GEO-State 048705 Dep. Exhibit 96 Singleton	Stipulated	Disputed	FRE 402, 701, 802, F	
97	02/02/2006 Memorandum from Pierce to Alisha Singleton GEO-State 213595 Dep. Exhibit 97 Singleton	Stipulated	Disputed	FRE 402, 701, 802, F	
98	6/24/2005 Memorandum from Alisha Singleton to all supervisors & kitchen officers GEO-State 048704 Dep. Exhibit 98 Singleton	Stipulated	Disputed	FRE 402, 701, 802, F	
99	1/13/2006 Memorandum from Alisha Singleton to Graveyard Supervisors GEO-State 213599 Dep. Exhibit 99 Singleton	Stipulated	Disputed	FRE 402, 701, 802, F	

100	Volunteer Work Program for Pod Workers (Undated) GEO-Nwauzor 016427 (Same as Exhibit 328)	Stipulated	Stipulated		
101	Job Description - Pod Porters 2009 GEO-State 241568-241569 Dep. Exhibit 101 Singleton	Stipulated	Stipulated		
102	Worker Program Classification GEO-State 033225-033226 Dep. Exhibit 102 Singleton	Stipulated	Stipulated		
103	Refusal to Work Form GEO-State 241573 Dep. Exhibit 103 Singleton	Stipulated	Stipulated		
104	Kitchen Kite 7/9/2010 GEO-State 103716 Dep. Exhibit 104 Singleton	Stipulated	Disputed	FRE 402, 701, 802, F	
105	Detainees Removed from Kitchen per IDP Sanctions GEO-State 231181-231182 Dep. Exhibit 105 Singleton	Stipulated	Disputed	FRE 402, 701, 802, F	
106	2/23/2006 Memorandum from Alisha Singleton to Lt. Robbins GEO-State 213593 Dep. Exhibit 106 Singleton	Stipulated	Disputed	FRE 402, 701, 802, F	
107	2.A Exhibit D Tacoma Revised Pricing Guarantee 072715.xls GEO-State 049255	Stipulated	Disputed	FRE 402, 701, 802, F	
108	8/15/2007 Memorandum C/O Brock to Alisha Singleton GEO-State 214117 Dep. Exhibit 108 Singleton	Stipulated	Disputed	FRE 402, 701, 802, F	
109	Photographs of the medical area in the NWDC WA00030992	Stipulated	Disputed	FRE 402, 701, 802, F	

110	Email from Nels Riach to Alisha Singleton, et al. Subject: UDC for kitchen worker. Singleton Dep. 08/22/17. GEO-State 242218 Dep. Exhibit 110 Singleton	Stipulated	Disputed	FRE 402, 701, 802, F	
111	1/15/2014 Email from Mike Snyder to Alisha Singleton GEO-State 241372-241373 Dep. Exhibit 111 Singleton	Stipulated	Disputed	FRE 402, 701, 802, F	
112	11/7/2016 Email from Alisha Singleton to Gwendolyn Haskins GEO-State 191669-191670 Dep. Exhibit 112 Singleton	Stipulated	Disputed	FRE 402, 701, 802, F	
113	5/20/2013 Batch Summary GEO-State 120005-120042 Dep. Exhibit 113 Singleton	Stipulated	Disputed	FRE 402, 701, 802, F	
114	10/04/2011 Batch Summary GEO-State 069664-069693 Dep. Exhibit 114 Singleton	Stipulated	Disputed	FRE 402, 701, 802, F	
115	12/07/2009 Batch Summary GEO-State 104147-104170 Dep. Exhibit 115 Singleton	Stipulated	Disputed	FRE 402, 701, 802, F	
116	03/13/2006 Batch Listing GEO-State 207085-207103 Dep. Exhibit 116 Singleton	Stipulated	Disputed	FRE 402, 701, 802, F	
117	06/08/2010 Batch Listing GEO-State 109685-109723 Dep. Exhibit 117 Singleton	Stipulated	Disputed	FRE 402, 701, 802, F	
118	3/25/2005 Detainee Kite GEO-State 208882 Dep. Exhibit 118 Singleton	Stipulated	Disputed	FRE 402, 701, 802, F	
119	Laundry Photograph WA00030823	Stipulated	Disputed	FRE 402, 701, 802, F	

120	4/29/2010 Email from Alisha Singleton to Leroy Portillo GEO-State 022193 Dep. Exhibit 120 Singleton	Stipulated	Disputed	FRE 402, 701, 802, F	
121	7/19/2011 Memorandum from E. Smith to all concerned GEO-State 036819 Dep. Exhibit 121 Singleton	Stipulated	Disputed	FRE 402, 701, 802, F	
122	5/1/2005 Memorandum from C/O K. Daniel to Alisha Singleton GEO-State 213680 Dep. Exhibit 122 Singleton	Stipulated	Disputed	FRE 402, 701, 802, F	
123	NWDC Detainee Handbook – 8/1/16 GEO-State 011328-011365 Dep. Exhibit 123 Singleton	Stipulated	Stipulated		
124	Tacoma Pricing 1575 040609 (Revised).xls GEO-State 022284	Stipulated	Disputed	FRE 402, 701, 802, F	
125	Barbershop Photograph WA00029845	Stipulated	Disputed	FRE 402, 701, 802, F	
126	02/14/2007 Memorandum to Alisha Singleton GEO-State 213832 Dep. Exhibit 126 Singleton	Stipulated	Disputed	FRE 402, 701, 802, F	
127	Complete Copy of 2011 PBNDS, as revised GEO-Nwauzor 184813-185267	Stipulated	Stipulated		
128	GEO NWDC Policy and Procedure Manual: Detainee Classification, Effective: 4/13/2015 GEO-State 044801-044810 Dep. Exhibit 128 Singleton	Stipulated	Stipulated		

129	2015 contract between Immigration and Customs Enforcement (ICE) and GEO, No. HSCEDM-15-D-00015 in effect September 28, 2015 GEO-State 036825-037027 And GEO-Nwauzor 085023-05225 Dep. Exhibit 129 McHatton	Stipulated	Disputed	C	
130	NWDC Chronological Routine Events GEO-State 028802-028803 Dep. Exhibit 130 McHatton	Stipulated	Disputed	FRE 402, 701, 802, F	
131	Welcome Book ACA Audit – September 25-27, 2017 GEO-State 242548-242624 Dep. Exhibit 131 McHatton	Stipulated	Disputed	FRE 402, 701, 802, F	
132	September 1, 2015 Department Head Meeting Minutes GEO-State 014578-014579 Dep. Exhibit 132 McHatton	Stipulated	Stipulated		
133	NWDC Detainee Laundry Training GEO-State 003525 Dep. Exhibit 133 McHatton	Stipulated	Stipulated		
134	Division of Immigration Health Services CDF Tacoma- Detainee Record Cleaning GEO-State 003528 Dep. Exhibit 134 McHatton	Stipulated	Disputed	FRE 402, 701, 802, F	
135	Annual OSHA Inspection Barber Shop GEO-State 037347 Dep. Exhibit 135 McHatton	Stipulated	Disputed	FRE 402, 701, 802, F	
136	GEO Corporate Policy Manual-- 7.1.11: Personal Protective Equipment, Effective 12/11/09 GEO-State 000783-000784 Dep. Exhibit 136 McHatton	Stipulated	Stipulated		

137	GEO NWDC Policy and Procedure Manual 3.3.1: Infractions and Disciplinary Sanctions GEO-State 016389-016407 Dep. Exhibit 137 McHatton (Also Dep. Exhibit 352 Scott)	Stipulated	Stipulated		
138	J. Black to C. Nelson and others with Detainee letter re: hunger strike. 03/08/14 GEO-Nwauzor 096527-096530	Stipulated	Disputed	FRE 402, 701, 802, F	
139	Post Order: Barber Shop, Effective Date: 10/10/2017 GEO-State 027416-027438 Dep. Exhibit 139 McHatton	Stipulated	Stipulated		
140	Post Order: Housing Unit Officer, Effective Date: 4/5/2016 GEO-State 027439-02746 Dep. Exhibit 140 McHatton	Stipulated	Stipulated		
141	Post Order: Laundry Officer, Effective Date: 4/5/2016 GEO-State 028704-028726 Dep. Exhibit 141 McHatton	Stipulated	Stipulated		
142	Post Order: Kitchen Officer Swing, Effective Date: 04/13/2015 GEO-State 016065-016090 Dep. Exhibit 142 McHatton	Stipulated	Stipulated		
143	House Unit Photograph WA00030674	Stipulated	Disputed	FRE 402, 701, 802, F	
144	Technical and Management Capability: Management and Technical Capabilities Plan, August 25, 2015 GEO-State 040960-041033 Dep. Exhibit 144 McHatton	Stipulated	Stipulated		
145	Visiting Room Photograph WA00029860	Stipulated	Disputed	FRE 402, 701, 802, F	

146	8/24/2011 Memorandum from Heather West to Mike Ruckstuhl GEO-State 020014 Dep. Exhibit 146 McHatton	Stipulated	Disputed	FRE 402, 701, 802, F	
147	GEO NWDC Policy and Procedure Manual--2.1.4: Environmental Health Independent Audits, Effective GEO-State 041454-041477 Dep. Exhibit 147 McHatton	Stipulated	Stipulated		
148	3/1/2016 Memorandum from Lowell Clark to Ryan Kimble, Bill McHatton, Lee Jaramillo GEO-State 033147-033148 Dep. Exhibit 148 McHatton	Stipulated	Stipulated		
149	GEO NWDC Policy and Procedure Manual—4.4.1: Housekeeping Services, Effective 4/18/2014 GEO-State 047869-047873 Dep. Exhibit 149 McHatton	Stipulated	Stipulated		
150	Visiting Room Photograph WA00029864	Stipulated	Disputed	FRE 402, 701, 802, F	
151	7/6/2015 Monday Morning Briefing GEO-State 006272-006273 Dep. Exhibit 151 McHatton	Stipulated	Disputed	FRE 402, 701, 802, F	
152	Tacoma Fire Inspection Report GEO-State 232433-232434 Dep. Exhibit 152 McHatton	Stipulated	Disputed	FRE 402, 701, 802, F	
153	NWDC Weekly Operations Report Oct. 24-30, 2016 GEO-State 041441-041453 Dep. Exhibit 153 McHatton	Stipulated	Disputed	FRE 402, 701, 802, F	
154	Organizational chart, Rev. 10-27-2011 GEO-State 235884 Dep. Exhibit 154 Scott	Stipulated	Disputed	FRE 402, 701, 802, F	
155	Standards Compliance Checklist – Fire Safety GEO-State 040055-040064 Dep. Exhibit 155 Scott	Stipulated	Stipulated		

156	Weekly Sanitation Inspection – 2/14/2011 GEO-State 016389-016407 Dep. Exhibit 156 Scott	Stipulated	Disputed	FRE 402, 701, 802, F	
157	NWDC Officer Unit Report GEO-State 270055-270111 Dep. Exhibit 157 Scott	Stipulated	Disputed	FRE 402, 701, 802, F	
158	NWDC Monthly Safety Committee Agenda GEO-State 049088-049092 Dep. Exhibit 158 Scott	Stipulated	Disputed	FRE 402, 701, 802, F	
159	NWDC Roster/Sign-In Sheet Hazard Comm /Housekeeping Plan – Bruce Scott Training GEO-State 243075 Dep. Exhibit 159 Scott	Stipulated	Disputed	FRE 402, 701, 802, F	
160	11/15/2011 Email from Heather West to Bruce Scott GEO-State 020106 Dep. Exhibit 160 Scott	Stipulated	Disputed	FRE 402, 701, 802, F	
161	8/8/2011 Email from Bruce Scott to Bill McHatton GEO-State 000622-000628 Dep. Exhibit 161 Scott	Stipulated	Disputed	FRE 402, 701, 802, F	
162	11/29/2011 Department Head Meeting Notes GEO-State 014575-014577 Dep. Exhibit 162 Scott	Stipulated	Stipulated		
163	NWDC Organizational Chart revised 7/1/2014 GEO-State 249465 Dep. Exhibit 163 Scott	Stipulated	Disputed	FRE 402, 701, 802, F	
164	2016 National Detainee Handbook GEO-State 003481-003508	Stipulated	Stipulated		
165	5/12/2015 Monday Morning Briefing GEO-State 050312-050313 Dep. Exhibit 165 Scott	Stipulated	Disputed	FRE 402, 701, 802, F	
166	Excel Sheet (PDF)– Compliance 2015-2017 GEO-State 028807 Dep. Exhibit 166 Scott	Stipulated	Disputed	FRE 402, 701, 802, F	

167	03/29/2013 Memorandum from Lt. Portillo to Bruce Scott GEO-State 241029-241030 Dep. Exhibit 167 Scott	Stipulated	Disputed	FRE 402, 701, 802, F	
168	3/6/2013 Facility Jobs Available GEO-State 252347 Dep. Exhibit 168 Scott	Stipulated	Disputed	FRE 402, 701, 802, F	
169	3/2/2017 Email from Bruce Scott to Ryan Kimble GEO-State 049435-049465 Dep. Exhibit 169 Scott	Stipulated	Disputed	FRE 402, 403, 701, 802, F	
170	9/30/2017 Email from Mike Snyder to Bruce Scott GEO-State 052346 Dep. Exhibit 170 Scott	Stipulated	Disputed	FRE 402, 403, 701, 802, F	
171	1/2/2013 Law Library Sign-up Sheet GEO-State 252634-252636 Dep. Exhibit 171 Scott	Stipulated	Disputed	FRE 402, 701, 802, F	
172	1/2/2012 Law Library Schedule GEO-State 252412 Dep. Exhibit 172 Scott	Stipulated	Disputed	FRE 402, 701, 802, F	
173	January 2013 Barbershop Schedule GEO-State 252417-252420 Dep. Exhibit 173 Scott	Stipulated	Disputed	FRE 402, 701, 802, F	
174	7/6/2015 Monday Morning Briefing GEO-State 243079-243080 Dep. Exhibit 174 Kimble	Stipulated	Disputed	FRE 402, 701, 802, F	
175	1/2/2017 Batch Summary GEO-State 227051-227091 Dep. Exhibit 175 Kimble	Stipulated	Disputed	FRE 402, 701, 802, F	
176	1/5/2014 December Worker Pay Memo GEO-State 047699 Dep. Exhibit 176 Kimble	Stipulated	Disputed	FRE 402, 701, 802, F	

177	5/2/2016 April 1-30, 2016 Worker Pay Memo GEO-State 047661 Dep. Exhibit 177 Kimble	Stipulated	Disputed	FRE 402, 701, 802, F	
178	2/1/2017 January 1-31, 2017 Worker Pay Memo GEO-State 047694 Dep. Exhibit 178 Kimble	Stipulated	Disputed	FRE 402, 701, 802, F	
179	Invoice to ICE August 2008 GEO-State 038905-38907 Dep. Exhibit 179 Kimble	Stipulated	Disputed	C	
180	Invoice to ICE November 2016 GEO-State 250787-250788, GEO-State 047133-147134 Dep. Exhibit 180 Kimble	Disputed	Disputed	C	
181	Invoice to ICE for January 2018 GEO-State 045343-045354 Dep. Exhibit 181 Kimble	Stipulated	Disputed	C	
182	6/3/2015 Letter from Amber Martin to James Dana Adams GEO-State 249284 Dep. Exhibit 182 Kimble	Stipulated	Disputed	FRE 402, 701, 802, F	
183	12/19/2014, No. HSCEDM-15-R-00001, GEO Cost/Price Proposal GEO-State 048155-048161 Dep. Exhibit 183 Kimble	Stipulated	Disputed	C	
184	8/25/2015 Email from Matt DenAdel to Amber Martin with attached Final GEO Ex. D Tacoma 1101 Bed Guarantee 082575.xls pricing workbook GEO-State 248404-248406 Dep. Exhibit 184 Kimble	Stipulated	Disputed	C	
185	Batch Summary 2/28/2014 for work on 2/27/2014 GEO-State 139888-139924	Stipulated	Disputed	FRE 701, 802, F	

186	4/4/2014 Email from Ryan Kimble to Amanda Valencia with attached Q1 2014 actual to Budget spreadsheet GEO-State 035580-035582 Dep. Exhibit 186 Kimble	Stipulated	Disputed	C	
187	NWDC Facility Variance Report March 2014 GEO-State 033144 Dep. Exhibit 187 Kimble	Stipulated	Disputed	C	
188	10/30/2017 Letter from Ryan Kimble to Roberta Hall GEO-State 046233-046235 Dep. Exhibit 188 Kimble	Stipulated	Disputed	C	
189	12/6/2013 Email from Lowell Clark to Ryan Kimble GEO-State 227765 Dep. Exhibit 189 Kimble	Stipulated	Disputed	FRE 402, 701, 802, F	
190	4/18/2016 Email from James Grant to Adrian Sandoval et al. GEO-State 258097-258105 Dep. Exhibit 190 Kimble	Disputed	Disputed	FRE 402, 701, 802, F	
191	Photographs of the visitation area in the NWDC WA00029857	Stipulated	Disputed	FRE 402, 701, 802, F	
192	Photographs of the visitation area in the NWDC WA00029869	Stipulated	Disputed	FRE 402, 701, 802, F	
193	11/25/2014 Email from Lowell Clark to Ryan Kimble with Staffing Plan for 1303 Detainees Spreadsheet (color) GEO-State 036453-036456 Dep. Exhibit 193 Kimble (Dep. Exhibit is missing page 036454)	Stipulated	Disputed	FRE 402, 701, 802, F	
194	2014 Budget Western Region Overview – Slideshow GEO-State 227808-227859 Dep. Exhibit 194 Kimble	Stipulated	Disputed	FRE 402, 701, 802, F	

195	Facility Variance Report Q1 2014 v. Q1 2013 GEO-State 035583 Dep. Exhibit 195 Kimble	Stipulated	Disputed	FRE 402, 701, 802, F	
196	GEO NWDC Policy 5.1.2, supersedes 4/13/2009 Contract – Governing the Voluntary Work program GEO-State 005798-005805	Stipulated	Stipulated		
197	GEO NWDC Policy 5.1.2, effective 4/18/14 GEO-State 003460-003467	Stipulated	Stipulated		
198	Solicitation, Offer, and Award for ICE Contract GEO-State 040430-040660 Dep. Exhibit 198 Bingham	Stipulated	Disputed	C	.
199	GEO's Budget Spreadsheet GEO-State 229681 (printed from .xls) (same content as Dep. Exhibit 199 Bingham)	Stipulated	Disputed	FRE 402, 701, 802, F	
200	2008 National Detainee Handbook GEO-State 015696-015723	Stipulated	Stipulated		
201	NWDC Detainee Handbook, Revised 1/17/2017 GEO-State 253723-253748	Stipulated	Stipulated		
202	Award for GEO/ICE Contract 2009 GEO-State 270461-270648 Dep. Exhibit 202 Bingham	Stipulated	Disputed	C	
203	July 26, 2002 Correctional Services Corporation Contract GEO-State 00270649-00270784 Dep. Exhibit 203 Bingham	Stipulated	Disputed	FRE 402, 701, 802, F	
204	NWDC Detainee Handbook, Signed 4/09/2015 GEO-State 006053-006090	Stipulated	Stipulated		
205	Declaration of Tae Johnson ECF No. 91 Dep. Exhibit 205 Bingham	Stipulated	Stipulated		
209	Register of Wage Determinations Dep. Exhibit 209 Nickerson	Disputed	Disputed	FRE 402, 701, 702, 802, F	

210	Facility Jobs Available, 5/10/13 GEO-State 252601 Dep. Exhibit 210 Nickerson	Stipulated	Disputed	FRE 402, 701, 702, 802, F	
211	Offender Job Program Assignments GEO State 000931	Stipulated	Disputed	FRE 402, 701, 702, 802, F	
212	Barbershop Photograph WA00029833	Stipulated	Disputed	FRE 402, 701, 802, F	
213	Barbershop Photograph WA00029822	Stipulated	Disputed	FRE 402, 701, 802, F	
214	Barbershop Photograph WA00029814	Stipulated	Disputed	FRE 402, 701, 802, F	
215	Barbershop Photograph WA00029781	Stipulated	Disputed	FRE 402, 701, 802, F	
216	Barbershop Photograph WA00029783	Stipulated	Disputed	FRE 402, 701, 802, F	
217	Law Library Photograph WA00029742	Stipulated	Disputed	FRE 402, 701, 802, F	
218	Grey Mile Photograph WA00029760	Stipulated	Disputed	FRE 402, 701, 802, F	
219	Barbershop Photograph WA00029788	Stipulated	Disputed	FRE 402, 701, 802, F	
220	Barbershop Photograph WA00029811	Stipulated	Disputed	FRE 402, 701, 802, F	
221	Barbershop Photograph WA00029821	Stipulated	Disputed	FRE 402, 701, 802, F	
222	Barbershop Photograph WA00029839	Stipulated	Disputed	FRE 402, 701, 802, F	
223	Barbershop Photograph WA00029843	Stipulated	Disputed	FRE 402, 701, 802, F	

224	Post Orders – Laundry Officer GEO-State 044392-044414 Dep. Exhibit 224 Menza	Stipulated	Stipulated		
225	GEO OJT for new Laundry Supervisors GEO-State 023610-023616 Dep. Exhibit 225 Menza	Stipulated	Stipulated		
226	8/24/2011 Memorandum from Heather West to Mike Ruckstuhl GEO-State 020012 Dep. Exhibit 226 Menza	Stipulated	Disputed	FRE 402, 701, 802, F	
227	5/15/2017 Email from Michael Heye to Marc Johnson GEO-State 242922-242924 Dep. Exhibit 227 Menza	Stipulated	Disputed	FRE 402, 701, 802, F	
228	Blank Daily Detainee Worker Pay Sheet GEO-State 033236 Dep. Exhibit 228 Menza	Stipulated	Stipulated		
229	VWP Agreement GEO-State 015834 Dep. Exhibit 229 Menza	Stipulated	Stipulated		
230	VWP 92833– Spanish GEO-State 015835 Dep. Exhibit 230 Menza	Stipulated	Stipulated		
231	Laundry Detail – List of Laundry Workers GEO-State 241705-241706 Dep. Exhibit 231 Menza	Stipulated	Disputed	FRE 701, 802, F	
232	Daily Work Crew County Sheet GEO-State 233578-233581 Dep. Exhibit 232 Menza	Stipulated	Disputed	FRE 701, 802, F	
233	Photograph of hallway outside of laundry with detainee and 3 GEO employees WA00030811 Dep. Exhibit 233 Menza	Stipulated	Disputed	FRE 402, 701, 802, F	

234	Photograph of bins with laundry in the hallway outside of the laundry WA00030821 Dep. Exhibit 234 Menza	Stipulated	Disputed	FRE 402, 701, 802, F	
235	Photograph of washing machines WA00030830 Dep. Exhibit 235 Menza	Stipulated	Disputed	FRE 402, 701, 802, F	
236	Photograph of metal shelving in laundry WA00030838 Dep. Exhibit 236 Menza	Stipulated	Disputed	FRE 402, 701, 802, F	
237	Photograph of narrow hallway with ducts and machinery in laundry WA00030845 Dep. Exhibit 237 Menza	Stipulated	Disputed	FRE 402, 701, 802, F	
238	Photograph of dryers and washers with bins of laundry in the middle WA00030854 Dep. Exhibit 238 Menza	Stipulated	Disputed	FRE 402, 701, 802, F	
239	Photograph of closet in laundry with shelving of white cloth and shoes WA00030876 Dep. Exhibit 239 Menza	Stipulated	Disputed	FRE 402, 701, 802, F	
240	Photograph of closet with numbered white bins and brooms and broom outlines WA00030879 Dep. Exhibit 240 Menza	Stipulated	Disputed	FRE 402, 701, 802, F	
241	Photographs of shelves with multi-colored detainee uniforms in laundry WA00030880 Dep. Exhibit 241 Menza	Stipulated	Disputed	FRE 402, 701, 802, F	

242	Photograph of laundry shelves with piles of plastic bags marked trash and view of hallway Dep. Exhibit 242 Menza WA00030888	Stipulated	Disputed	FRE 402, 701, 802, F	
243	Photograph of bulletin board in office in laundry WA00030955 Dep. Exhibit 243 Menza	Stipulated	Disputed	FRE 402, 701, 802, F	
244	Photograph of laundry with detainee emptying drier WA00030891 Dep. Exhibit 244 Menza	Stipulated	Disputed	FRE 402, 701, 802, F	
245	Photograph of charts with "DONE" written in marker – D-3-Unit and Medical 2 WA00030940 Dep. Exhibit 245 Menza	Stipulated	Disputed	FRE 402, 701, 802, F	
246	Close-up photograph of drier warning label and control panel WA000309916 Dep. Exhibit 246 Menza	Stipulated	Disputed	FRE 402, 701, 802, F	
247	Photograph of bleach behind fencing WA00030931 Dep. Exhibit 247 Menza	Stipulated	Disputed	FRE 402, 701, 802, F	
248	Photograph of Chart with items to be processed in laundry WA00030937 Dep. Exhibit 248 Menza	Stipulated	Disputed	FRE 402, 701, 802, F	
249	Photograph of plastic shelves in laundry with plastic utensils WA00030921 Dep. Exhibit 249 Menza	Stipulated	Disputed	FRE 402, 701, 802, F	
250	Photograph of office in laundry WA00030891 Dep. Exhibit 250 Menza	Stipulated	Disputed	FRE 402, 701, 802, F	

251	Photographs of the law library in the NWDC WA00029726	Stipulated	Disputed	FRE 402, 701, 802, F	
252	Consolidated Financial Statement for 2005 through 2018 for Northwest Detention Center Dep. Exhibit 252 Hill	Stipulated	Disputed	FRE 701, 802, F	
253	Consolidated Financial Statement for 2005 through 2018 for Northwest Detention Center with writing Dep. Exhibit 253 Hill	Stipulated	Disputed	FRE 701, 802, F	
254	2015 ICE Fiscal Year Contract Billing Accumulation per CLIN with attachments GEO-State 046790-046803 Dep. Exhibit 254 Hill	Stipulated	Disputed	FRE 701, 802, F	
255	December 7, 2009 Revised Pricing – Contract No. HSCDEM-10-D-00001 GEO-State 251859-251862 Dep. Exhibit 255 Hill	Stipulated	Disputed	FRE 401/402, 701, 802, F	
256	November 19, 2009 Letter from GEO to DHS Contracting Officer re Contract GEO-State 251819-251822 Dep. Exhibit 256 Hill	Stipulated	Disputed	FRE 402, 403, 701, 802, F	
257	4/14/2009 Email from Shihpei Stevenson to George Wigen with attached NWDC 1000 beds expanded to 1575 bed pricing spreadsheet 040609 (Revised) GEO-State 022282-022293 (022294 was withheld as non-responsive) Dep. Exhibit 257 Hill	Stipulated	Disputed	FRE 402, 701, 802, F	
258	12/8/2009 Email from Eric Smith to George Wigen with attached NWDC 1000 beds expanded to 1575 beds alternative pricing spreadsheet 112509 GEO-State 022245-022246 Dep. Exhibit 258 Hill	Stipulated	Disputed	FRE 402, 701, 802, F	

259	5/2/2017 Email from Chuck Hill to Ryan Kimble GEO-State 250974-250975 Dep. Exhibit 259 Hill	Stipulated	Disputed	FRE 402, 701, 802, F	
260	9/2/2015 Email from Ryan Kimble to Chuck Hill GEO-State 027910-02791 Dep. Exhibit 260 Hill	Stipulated	Disputed	FRE 701, 802, F	
261	Northwest ICE Processing Center Facility Budget Summaries GEO-State 299184, GEO-State 299195 (color .xls)	Stipulated	Disputed	FRE 701, 802, F	
262	Northwest ICE Processing Center Facility Financial Summaries GEO-State 299185, GEO-State 299196 (color .xls)	Stipulated	Disputed	FRE 701, 802, F	
263	GEO NWDC 1575 Bed Per Diem Calculation GEO-State 299191-299192	Stipulated	Disputed	FRE 402, 701, 802, F	
264	GEO NWDC 1000 Beds Expanded to 1575 Bed Per Diem Calculation GEO-State 299193	Stipulated	Disputed	FRE 402, 701, 802, F	
265	GEO NWDC Total Staffing Plan (1575 Beds) GEO-State 299186-299187	Stipulated	Disputed	FRE 402, 701, 802, F	
266	GEO NWDC Exhibit A Staffing Plan (1575 Detainees) GEO-State 299188-299190	Stipulated	Disputed	FRE 402, 701, 802, F	
267	NWDC Pricing Spreadsheets GEO-State 022248	Stipulated	Disputed	FRE 402, 701, 802, F	
268	GEO Budget Excel Spreadsheet (March 2013 Budget to Actual Facility Variance Report) GEO-State 035584	Stipulated	Disputed	FRE 701, 802, F	
269	GEO NWDC Detainee Work Reimbursement from ICE GEO-State 299194	Stipulated	Disputed	FRE 701, 802, F	
270	2005 NWDC Year End Report.doc GEO-State 029290-029309	Stipulated	Disputed	FRE 701, 802, F	

271	2006 NWDC Year End Report.doc GEO-State 029676-029697	Stipulated	Disputed	FRE 701, 802, F	
272	2008 NWDC Year End Report.doc GEO-State 029741-029764	Stipulated	Disputed	FRE 701, 802, F	
273	2013 NWDC Year End Report GEO-State 050215-050241	Stipulated	Stipulated	FRE 701, 802, F	
274	Work Crew Count Tally January 2007 GEO-State 048413	Stipulated	Disputed	FRE 701, 802, F	
275	Work Crew.xls GEO-State 048409	Stipulated	Disputed	FRE 701, 802, F	
276	Work Crew Count.xls GEO-State 048411	Stipulated	Disputed	FRE 701, 802, F	
277	App. D-Work Crew.xls GEO-State 048412	Stipulated	Disputed	FRE 701, 802, F	
278	GEO Group, Inc. Annual Report 2003 WA00003818-00003893	Stipulated	Disputed	FRE 701, 802, F	
279	GEO Group, Inc. Annual Report 2004 WA00003894-00003945	Stipulated	Disputed	FRE 701, 802, F	
280	GEO Group, Inc. Annual Report 2005 WA00003946-00003995	Stipulated	Disputed	FRE 701, 802, F	
281	GEO Group, Inc. Annual Report 2006 WA00003996-00004063	Stipulated	Disputed	FRE 701, 802, F	
282	GEO Group, Inc. Annual Report 2007 WA00004064-00004133	Stipulated	Disputed	FRE 701, 802, F	
283	GEO Group, Inc. Annual Report 2008 WA00004134-00004190	Stipulated	Disputed	FRE 701, 802, F	
284	GEO Group, Inc. Annual Report 2009 WA00004191-00004297	Stipulated	Disputed	FRE 701, 802, F	
285	GEO Group, Inc. Annual Report 2010 WA00004298-00004417	Stipulated	Disputed	FRE 701, 802, F	
286	GEO Group, Inc. Annual Report 2011 WA00004418-00004539	Stipulated	Disputed	FRE 701, 802, F	

287	GEO Group, Inc. Annual Report 2012 WA00004540-00004661	Stipulated	Disputed	FRE 701, 802, F	
288	GEO Group, Inc. Annual Report 2013 WA00004662-00004806	Stipulated	Disputed	FRE 701, 802, F	
289	GEO Group, Inc. Annual Report 2014 WA00004807-00004944	Stipulated	Disputed	FRE 701, 802, F	
290	GEO Group, Inc. Annual Report 2015 WA00004945-00005083	Stipulated	Disputed	FRE 701, 802, F	
291	GEO Group, Inc. Annual Report 2016 WA00005084-00005242	Stipulated	Disputed	FRE 701, 802, F	
292	GEO Group, Inc. Annual Report 2017 WA00005243-00005398	Stipulated	Disputed	FRE 701, 802, F	
293	GEO Group, Inc. Annual Report 2018 <u>http://www.snl.com/interactive/newlookandfeel/4144107/GEOGroup2018AR.pdf</u>	Stipulated	Disputed	FRE 701, 802, F	
294	First Quarter 2018 Supplemental Information WA00003620-00003643	Stipulated	Disputed	FRE 701, 802, F	
295	The GEO Group Signs Contract for the Continued Management of the Northwest Detention Center [Press Release] https://www.businesswire.com/news/home/20151001005937/en/	Disputed	Disputed	FRE 402, 403, 602, 701, 802, F	
296	Personnel Action Forms dated 10/27/2017 & 10/27/2010 GEO State 239955-239957	Stipulated	Disputed	FRE 402, 403, 602, 701, 802, F	
297	House Unit Photograph WA00030778	Stipulated	Disputed	FRE 402, 701, 802, F	
298	House Unit Photograph WA00030794	Stipulated	Disputed	FRE 402, 701, 802, F	
299	House Unit Photograph WA00030396	Stipulated	Disputed	FRE 402, 701, 802, F	

300	Internal/External Job Posting – Food Service Supervisor NWDC GEO-Nwauzor 054190-054191 Dep. Exhibit 300 Delacruz	Stipulated	Stipulated		
301	OJT for Food Service Manager GEO-Nwauzor 026284-026292 Dep. Exhibit 301 Delacruz	Stipulated	Stipulated		
302	Photographs of the law library in the NWDC WA00029747	Stipulated	Disputed	FRE 402, 701, 802, F	
303	Food Service Department - Food Cost Summary GEO-Nwauzor 040015 Dep. Exhibit 303 Delacruz	Stipulated	Disputed	FRE 402, 701, 802, F	
304	Job Descriptions: Cook, Dishwasher, Food Prep, Light Duty, Line Back-up, Lineserver, Pots and Pans, Storeroom Puller, Utility Dep. Exhibit 304 Delacruz	Stipulated	Stipulated		
305	Kitchen Worker Orientation Checklist GEO-Nwauzor 004619-004629 Dep. Exhibit 305 Delacruz	Stipulated	Stipulated		
306	Detainee/Staff Health and Hygiene GEO-Nwauzor 177020-177022 Dep. Exhibit 306 Delacruz	Stipulated	Disputed	FRE 402, 701, 802, F	
307	PBNDS – 3.1 Discipline 2016 GEO-Nwauzor 018928-018941	Stipulated	Disputed	FRE 402, 609, 701, 802, F	
308	6/25/2017 Daily Detainee Worker Pay Sheet-Pod G1, G4 GEO-Nwauzor 0065428-065429 Dep. Exhibit 308 Delacruz	Stipulated	Disputed	FRE 701, 802, F	
309	10/22/2015 Pod Porters Roster GEO-Nwauzor 026921-026953 Dep. Exhibit 309 Delacruz	Stipulated	Disputed	FRE 701, 802, F	

310	House Unit Photograph WA00030397	Stipulated	Disputed	FRE 402, 701, 802, F	
311	Job Description - Sergeant GEO-Nwauzor 000340-000341 Dep. Exhibit 311 Tracy	Stipulated	Stipulated	FRE 402, 609, 701, 802, F	
312	NWDC - Organizational Chart GEO-Nwauzor 044059-044067 Dep. Exhibit 312 Tracy	Stipulated	Disputed	FRE 402, 701, 802, F	
313	Rosters of Facility Job Assignments - 2013 GEO-State 252601, 252974, 252910	Stipulated	Disputed	FRE 402, 609, 701, 802, F	
314	Memo re: QCP Reports for VWP from B. Scott to S. Delony 11/15/13 GEO-Nwauzor 005902	Stipulated	Disputed	FRE 402, 609, 701, 802, F	
315	Detainee Job Descriptions: Barber, Barbershop, Medical Cleaning, General Worker, Laundry Worker Dep. Exhibit 315 Tracy	Stipulated	Stipulated		
316	Detainee Pod Porter Job Descriptions GEO-Nwauzor 078053-078054 Dep. Exhibit 316 Tracy	Stipulated	Stipulated		
317	House Unit Photograph WA00030399	Stipulated	Disputed	FRE 402, 701, 802, F	
318	Email from Marc Johnson to Bertha Henderson re: 3 thefts from the kitchen 09/14/11 GEO-Nwauzor 001605 Dep. Exhibit 318 Johnson (Also Dep. Exhibit 107 Singleton)	Stipulated	Disputed	FRE 402, 403 609, 701, 802, F	
319	Erwin Delacruz Employee Training Sheet GEO-Nwauzor 085280-085281 Dep. Exhibit 319 Heye	Stipulated	Disputed	FRE 402, 609, 701, 802, F	

320	Memo re: QCP Reports for VWP from B. Scott to S. Delony 11/15/13 GEO-Nwauzor 005902	Stipulated	Disputed	FRE 402, 609, 701, 802, F	
321	5/30/14 Detainee Kite requesting to work GEO-Nwauzor 141925-141926 Dep. Exhibit 321 Heye	Stipulated	Stipulated		
322	Work Crew.xls GEO-State 048410	Stipulated	Disputed	FRE 701, 802, F	
323	12/26/12 Email from Van Ngonephasouk to Michael Heye GEO-Nwauzor 097538 Dep. Exhibit 323 Heye	Stipulated	Disputed	FRE 402, 609, 701, 802, F	
324	3/30/16 Department Head Meeting Minutes GEO-Nwauzor 181325-181326 Dep. Exhibit 324 Heye	Stipulated	Stipulated		
325	Slip Sheet RE: Excel spreadsheet entitled “Detainee Worker Average Hours” and Excel spreadsheet Dep. Exhibit 325 Heye (Also Dep. Exhibit 20)	Stipulated	Disputed	FRE 402, 609, 701, 802, F	
326	Presentation Outline, Lesson Title: Detainee Worker Program prepared by Alisha Singleton 12/29/11 GEO-Nwauzor 016346-016350 Dep. Exhibit 326 Heye	Stipulated	Stipulated		
327	Worker Program GEO-Nwauzor 058848 Dep. Exhibit 327 Heye	Stipulated	Stipulated		
328	Volunteer Work Program for Pods GEO-Nwauzor 016427 Dep. Exhibit 328 Heye	Stipulated	Stipulated		
329	House Unit Photograph WA00030403	Stipulated	Disputed	FRE 402, 701, 802, F	
330	Interior Photograph WA00031081	Stipulated	Disputed	FRE 402, 701, 802, F	

331	10/31/12 Email from McHatton re worker pay on keefe GEO-Nwauzor 008106-008108 Dep. Exhibit 331 Heye	Stipulated	Disputed	FRE 402, 701, 802, F	
332	Geo Group Trust Account 214 - Worker Pay Reimbursement 9/2015 with Payroll Transactions for 9/1/2015 – 10/2/2015 (partial) GEO-Nwauzor 073752-073761 Dep. Exhibit 332 Heye	Stipulated	Disputed	FRE 701, 802, F	
333	Declaration of former detainee Orlando Zavalza Marquez in Spanish WA00003543-00003546	Stipulated	Disputed	FRE 403, 701, 702, F	
334	Certified translation of the declaration of Orlando Zavalza Marquez in English. WA00006973-00006977	Stipulated	Disputed	FRE 403, 701, 702, F	
335	Declaration of former detainee Manuel Riveron Pina in Spanish WA00005399-00005402	Stipulated	Disputed	FRE 403, 701, 702, F	
336	Certified translation of the declaration of Manuel Riveron Pina in English WA00007582-00007586	Stipulated	Disputed	FRE 403, 701, 702, F	
337	Declaration of former detainee Jesus Lopez Paez in Spanish WA00007590-00007595	Stipulated	Disputed	FRE 403, 701, 702, F	
338	Certified translation of declaration of Jesus Lopez Paez in English WA00008066-00008072	Stipulated	Disputed	FRE 403, 701, 702, F	
339	Declaration of former detainee Judith Chavez Ortiz in Spanish WA00007587-00007589	Stipulated	Disputed	FRE 403, 701, 702, F	
340	Certified translation of declaration of Judith Chavez Ortiz in English WA00008073-00008076	Stipulated	Disputed	FRE 403, 701, 702, F	

341	Declaration of former detainee Karla Gomez Soto in Spanish WA00029708-00029710	Stipulated	Disputed	FRE 403, 701, 702, F	
342	Certified translation of declaration of Karla Gomez Soto in English WA00029711-00029714	Stipulated	Disputed	FRE 403, 701, 702, F	
343	Declaration of former detainee Noe Baltazar Noe in Spanish WA00029699-00029702	Stipulated	Disputed	FRE 403, 701, 702, F	
344	Certified Translation of declaration of Noe Baltazar Noe in English WA00029703-00029707	Stipulated	Disputed	FRE 403, 701, 702, F	
345	Bruce A. Scott information document Dep. Exhibit 345 Scott	Stipulated	Disputed	FRE 402, 701, 802, F	
346	2014 Welcome Book ACA Re-Accreditation Audit GEO-Nwauzor 022874-022940 Dep. Exhibit 346 Scott	Stipulated	Disputed	FRE 402, 701, 802, F	
347	Commission on Accreditation for Corrections Standards Compliance Reaccreditations Audit GEO-Nwauzor 028201-028239 Dep. Exhibit 347 Scott	Stipulated	Disputed	FRE 402, 701, 802, F	
348	2017 Welcome Book ACA Audit GEO-Nwauzor 044051-044127 Dep. Exhibit 348 Scott	Stipulated	Disputed	FRE 402, 701, 802, F	
349	2017 Commission on Accreditation for Corrections Standards Compliance Reaccreditations Audit GEO-Nwauzor 026329-026373 Dep. Exhibit 349 Scott	Stipulated	Disputed	FRE 402, 701, 802, F	
350	Letter dated January 20, 2017, from Bruce Scott to American Corrections Association GEO-Nwauzor 096706-096719 Dep. Exhibit 350 Scott	Stipulated	Disputed	FRE 402, 701, 802, F	

351	Email from Heye to Scott dated 2/13/13 GEO-Nwauzor 003715-003721 Dep. Exhibit 351 Scott	Stipulated	Disputed	FRE 402, 701, 802, F	
352	Kitchen Photograph WA00030166	Stipulated	Disputed	FRE 402, 701, 802, F	
353	Kitchen Photograph WA00030075	Stipulated	Disputed	FRE 402, 701, 802, F	
354	GEO's FRCP 26(a)(1) Initial Disclosures 12/27/17 Dep. Exhibit 354 Scott NWAUZOR ONLY	Stipulated	Disputed	FRE 402, 701, 802, F	
355	Annual NWDC Expense Spreadsheets GEO-Nwauzor 084666 Dep. Exhibit 355 Scott NWAUZOR ONLY	Stipulated	Disputed	FRE 701, 802, F	
356	2015 ICE-GEO Contract GEO-Nwauzor 096300-096502 Dep. Exhibit 356 Scott (Also Dep. Exhibit 129)	Stipulated	Disputed	C	
357	GEO's Responses to Nwauzor Plaintiffs First Interrogatories and Requests for Production Dep. Exhibit 357 Scott NWAUZOR ONLY	Stipulated	Disputed	FRE 402, 701, 802, F	
358	Invoice to ICE January 2017 – February 2018 GEO-State 045059-047718 Dep. Exhibit 358 Scott	Stipulated	Disputed	FRE 701, 802, F	
359	Article entitled “Tacoma immigration detention center is misunderstood” by James Black. TacomaNewsTribune-4/15/17-Opinion Page	Stipulated	Disputed	FRE 402, 701, 609, 802, F	
360	NWDC Facility Financial Summaries Spreadsheet GEO-Nwauzor 198805 Dep. Exhibit 360 Scott	Stipulated	Disputed	FRE 402, 701, 802, F	

361	PNBDS 2011 Section 5.8 GEO-Nwauzor 018711-019099 Dep. Exhibit 361 Scott (Also Dep. Exhibit 17 30(b)(6) Kimble)	Stipulated	Stipulated	FRE 402, 701, 802, F	
362	4/18/2006 and 4/7/2006 Batch Listings (partial) GEO-Nwauzor 293934; 293672 Dep. Exhibit 362 Scott	Stipulated	Disputed	FRE 402, 701, 802, F	
363	4/12/2012 Memorandum from Classification to Associate Warden McHatton re: VWP 2011 PBNDS Standards GEO-Nwauzor 016445 Dep. Exhibit 363 Scott (Also Dep. Exhibit 14)	Stipulated	Disputed	FRE 402, 701, 802, F	
364	8/30/2014 Email to Bill McHatton to Lowell Clark GEO-State 283813-14 Dep. Exhibit 364 Scott	Stipulated	Disputed	FRE 402, 701, 802, F	
365	May 30, 2018 Letter from GEO CEO to Peter Edge 2018-ICLI-00052-3404 Dep. Exhibit 365 Scott	Stipulated	Disputed	FRE 402, 403, 701, 802, MIL, F	
366	GEO Group Job Description – Job Title: Janitor. 04/2007 GEO-Nwauzor 010202	Stipulated	Stipulated	FRE 402, 701, 802, F	
367	GEO Group Job Description – Job Title: Food Service, Detention Officer. 04/2007 GEO-Nwauzor 014245-014246	Stipulated	Stipulated	FRE 402, 701, 802, F	
368	GEO Group Job Description – Job Title: Maintenance Technician. 04/2007 GEO-Nwauzor 014243-014244	Stipulated	Stipulated	FRE 402, 701, 802, F	
369	Worker Pay Reimbursement Request for work performed in July 2017, signed by Ryan Kimble 08/01/17 GEO-Nwauzor 072107-072290 Dep. Exhibit 369 Munson	Stipulated	Disputed	FRE 402, 701, 802, F	

370	Invoice to ICE for December 2009 GEO-State 039320-039321	Stipulated	Disputed	FRE 701, 802, F	
371	Invoice to ICE for December 2010 GEO-State 229228-229235	Stipulated	Disputed	FRE 701, 802, F	
372	Invoice to ICE for January 2011 GEO-State 229212-229222	Stipulated	Disputed	FRE 701, 802, F	
373	Invoice to ICE March 2011 GEO-State 297762-297770	Stipulated	Disputed	FRE 701, 802, F	
374	Invoice to ICE for December 2011 GEO-State 038133	Stipulated	Disputed	FRE 701, 802, F	
375	Invoice to ICE for December 2012 GEO-State 038143	Stipulated	Disputed	FRE 701, 802, F	
376	Invoice to ICE for December 2013 GEO-State 045929-045930	Stipulated	Disputed	FRE 701, 802, F	
377	Invoice to ICE for December 2014 GEO-State 045177	Stipulated	Disputed	FRE 701, 802, F	
378	Invoice to ICE for December 2015 GEO-State 044891, 044893	Stipulated	Disputed	FRE 701, 802, F	
379	Invoice to ICE January 2016 GEO-State 044956-044957	Stipulated	Disputed	FRE 701, 802, F	
380	Invoice to ICE February 2016 GEO-State 044955	Stipulated	Disputed	FRE 701, 802, F	
381	Invoice to ICE March 2016 GEO-State 041334, GEO-State 044968	Stipulated	Disputed	FRE 701, 802, F	
382	Invoice to ICE April 2016 GEO-State 044944-044945	Stipulated	Disputed	FRE 701, 802, F	
383	Invoice to ICE May 2016 GEO-State 044853, GEO-State 044972	Stipulated	Disputed	FRE 701, 802, F	
384	Invoice to ICE June 2016 GEO-State 046993	Stipulated	Disputed	FRE 701, 802, F	

385	Invoice to ICE August 2016 GEO-State 044948-044949	Stipulated	Disputed	FRE,7 01, 802, F	
386	Invoice External September 1-27, 2016 GEO-State 250783	Stipulated	Disputed	FRE 701, 802, F	
387	Invoice to ICE September 28-30, 2016 GEO-State 250784	Stipulated	Disputed	FRE 701, 802, F	
388	Invoice to ICE October 2016 GEO-State 044980	Stipulated	Disputed	FRE 701, 802, F	
389	Invoice to ICE November 2016 GEO-State 044975-044976	Stipulated	Disputed	FRE 701, 802, F	
390	Invoice External December 2016 GEO-State 044952-044953	Stipulated	Disputed	FRE 701, 802, F	
391	Invoice to ICE July 2017 GEO-State 045064-045074	Stipulated	Disputed	FRE 701, 802, F	
392	Invoice to ICE for December 2017 GEO-State 045252-045264	Stipulated	Disputed	FRE 701, 802, F	
393	Batch Summaries Daily Detainee Worker Pay Sheets for 7/6/2006 and 7/31/2006 GEO-State 204257, 122690	Stipulated	Disputed	FRE 701, 802, F	
394	Batch Summary 12/7/2007 for work 12/6/2007 GEO-State 214873-214898	Stipulated	Disputed	FRE 701, 802, F	
395	Batch Summary 12/21/2007 for work 12/20/2007 GEO-State 214446-214473	Stipulated	Disputed	FRE 701, 802, F	
396	Batch Summary 12/3/2008 for work 12/3/2008 GEO-State 220980-221006	Stipulated	Disputed	FRE 701, 802, F	
397	Batch Summary 3/1/2011 for work 2/27/2011 GEO-State 083231-083255	Stipulated	Disputed	FRE 701, 802, F	
398	Batch Summary 12/6/2012 for work 12/5/2012 GEO-State 113994-114030	Stipulated	Disputed	FRE 701, 802, F	
399	Batch Summary 12/21/2012 for work 12/20/2012 GEO-State 114558-114600	Stipulated	Disputed	FRE 701, 802, F	

400	Batch Summary 2/28/2013 for work 2/27/2013 GEO-State 117134-117171	Stipulated	Disputed	FRE 701, 802, F	
401	Batch Summary 3/14/2013 for work 3/13/2013 GEO-State 117629-117663	Stipulated	Disputed	FRE 701, 802, F	
402	Batch Summary 12/8/2014 for work 12/5/2014 GEO-State 150279-150309	Stipulated	Disputed	FRE 701, 802, F	
403	Batch Summary 12/22/2014 for work 12/20/2014 GEO-State 150759-150785	Stipulated	Disputed	FRE 701, 802, F	
404	Batch Summary 3/2/2015 for work 2/27/2015 GEO-State 152988-153019	Stipulated	Disputed	FRE 701, 802, F	
405	Batch Summary 3/12/2015 for work 3/11/2015 GEO-State 155516	Stipulated	Disputed	FRE 701, 802, F	
406	Batch Summary 12/6/2016 for work 12/5/2016 GEO-State 225507-225552	Stipulated	Disputed	FRE 701, 802, F	
407	Batch Summary 5/26/2017 for work 5/25/2017 GEO-State 185834-185871	Stipulated	Disputed	FRE 701, 802, F	
408	Batch Summary 7/24/2017 for work 7/22/2017 GEO-State 188980-189017	Stipulated	Disputed	FRE 701, 802, F	
409	VWP Work Roster (except kitchen) 10/31/2017 GEO-State 264894-264910	Stipulated	Disputed	FRE 701, 802, F	
410	VWP Work Roster (except kitchen) 12/1/2017 GEO-State 264873-264892	Stipulated	Disputed	FRE 701, 802, F	
411	VWP Work Schedule/Roster (except kitchen) 12/26/17 GEO-Nwauzor 066545-066569	Stipulated	Disputed	FRE 701, 802, F	
412	VWP Work Schedule/Roster (except kitchen) 01/02/18 GEO-Nwauzor 066387-066398	Stipulated	Disputed	FRE 701, 802, F	
413	VWP Work Roster (except kitchen) 2/2/2018 GEO-State 229987-230005	Stipulated	Disputed	FRE 701, 802, F	
414	VWP Work Roster (except kitchen) 2/6/2018 GEO-State 051606- 051627	Stipulated	Disputed	FRE 701, 802, F	

415	VWP Work Roster (except kitchen) 2/20/2018 GEO-State 051669-051684	Stipulated	Disputed	FRE 701, 802, F	
416	VWP Work Roster (except kitchen) 3/6/18 GEO-State 051685-015705	Stipulated	Disputed	FRE 701, 802, F	
417	VWP Work Roster (except kitchen) 3/9/18 GEO-State 051706- 051724	Stipulated	Disputed	FRE 701, 802, F	
418	VWP Work Roster (except kitchen) 3/16/18 GEO-State 051745- 051769	Stipulated	Disputed	FRE 701, 802, F	
419	House Unit Photograph WA00030761	Stipulated	Disputed	FRE 402, 701, 802, F	
420	House Unit Photograph WA00030765	Stipulated	Disputed	FRE 402, 701, 802, F	
421	House Unit Photograph WA00030766	Stipulated	Disputed	FRE 402, 701, 802, F	
422	House Unit Photograph WA00030768	Stipulated	Disputed	FRE 402, 701, 802, F	
423	2018-02-05 Defendant GEO's Responses to Washington's First Requests for Admission	Stipulated	Disputed	FRE 402, 701, 802, F	
424	2018-12-20 Defendant GEO's Responses to Washington's Second Requests for Admission	Stipulated	Disputed	FRE 402, 701, 802, F	
425	2018-02-05 Defendant GEO's Responses to Washington's First Interrogatories	Stipulated	Disputed	FRE 402, 701, 802, F	
426	2018-07-12 Defendant GEO's Responses to Washington's Second Interrogatories	Stipulated	Disputed	FRE 402, 701, 802, F	
427	2018-12-20 Defendant GEO's Responses to Washington's Third Interrogatories	Stipulated	Disputed	FRE 402, 701, 802, F	
428	2019-06-21 Defendant GEO's Supplemental Reponses to Washington's First, Second, Third Interrogatories	Stipulated	Disputed	FRE 402, 701, 802, F	
429	2019-11-21 Defendant GEO's Amended Responses to Washington's Second Interrogatories	Stipulated	Disputed	FRE 402, 701, 802, F	

430	Kitchen Photograph WA00030102	Stipulated	Disputed	FRE 402, 701, 802, F	
431	Kitchen Photograph WA00029909	Stipulated	Disputed	FRE 402, 701, 802, F	
432	Kitchen Photograph WA00029900	Stipulated	Disputed	FRE 402, 701, 802, F	
433	Kitchen Photograph WA00029967	Stipulated	Disputed	FRE 402, 701, 802, F	
434	Kitchen Photograph WA00030053	Stipulated	Disputed	FRE 402, 701, 802, F	
435	Kitchen Photograph WA00030082	Stipulated	Disputed	FRE 402, 701, 802, F	
436	Kitchen Photograph WA00029997	Stipulated	Disputed	FRE 402, 701, 802, F	
437	Kitchen Photograph WA00031034	Stipulated	Disputed	FRE 402, 701, 802, F	
438	Kitchen Photograph WA00029901	Stipulated	Disputed	FRE 402, 701, 802, F	
439	Kitchen Photograph WA00029904	Stipulated	Disputed	FRE 402, 701, 802, F	
440	Kitchen Photograph WA00029910	Stipulated	Disputed	FRE 402, 701, 802, F	
441	Kitchen Photograph WA00029914	Stipulated	Disputed	FRE 402, 701, 802, F	
442	Kitchen Photograph WA00029920	Stipulated	Disputed	FRE 402, 701, 802, F	
443	Kitchen Photograph WA00029927	Stipulated	Disputed	FRE 402, 701, 802, F	
444	Kitchen Photograph WA00029929	Stipulated	Disputed	FRE 402, 701, 802, F	
445	Kitchen Photograph WA00029932	Stipulated	Disputed	FRE 402, 701, 802, F	

446	Kitchen Photograph WA00029951	Stipulated	Disputed	FRE 402, 701, 802, F	
447	Kitchen Photograph WA00029959	Stipulated	Disputed	FRE 402, 701, 802, F	
448	Kitchen Photograph WA00029975	Stipulated	Disputed	FRE 402, 701, 802, F	
449	Kitchen Photograph WA00029981	Stipulated	Disputed	FRE 402, 701, 802, F	
450	Kitchen Photograph WA00029992	Stipulated	Disputed	FRE 402, 701, 802, F	
451	Kitchen Photograph WA00030010	Stipulated	Disputed	FRE 402, 701, 802, F	
452	Kitchen Photograph WA00030037	Stipulated	Disputed	FRE 402, 701, 802, F	
453	Kitchen Photograph WA00030046	Stipulated	Disputed	FRE 402, 701, 802, F	
454	Kitchen Photograph WA00030047	Stipulated	Disputed	FRE 402, 701, 802, F	
455	Kitchen Photograph WA00030057	Stipulated	Disputed	FRE 402, 701, 802, F	
456	Kitchen Photograph WA00030061	Stipulated	Disputed	FRE 402, 701, 802, F	
457	Kitchen Photograph WA00030105	Stipulated	Disputed	FRE 402, 701, 802, F	
458	Kitchen Photograph WA00030110	Stipulated	Disputed	FRE 402, 701, 802, F	
459	Kitchen Photograph WA00030119	Stipulated	Disputed	FRE 402, 701, 802, F	
460	Kitchen Photograph WA00030141	Stipulated	Disputed	FRE 402, 701, 802, F	
461	Kitchen Photograph WA00030145	Stipulated	Disputed	FRE 402, 701, 802, F	

462	Kitchen Photograph WA00030150	Stipulated	Disputed	FRE 402, 701, 802, F	
463	Recreation Area Photograph WA00030209	Stipulated	Disputed	FRE 402, 701, 802, F	
464	Recreation Area Photograph WA00030212	Stipulated	Disputed	FRE 402, 701, 802, F	
465	Recreation Area Photograph WA00030235	Stipulated	Disputed	FRE 402, 701, 802, F	
466	Recreation Area Photograph WA00030346	Stipulated	Disputed	FRE 402, 701, 802, F	
467	Recreation Area Photograph WA00030382	Stipulated	Disputed	FRE 402, 701, 802, F	
468	Recreation Area Photograph WA00031006	Stipulated	Disputed	FRE 402, 701, 802, F	
469	Recreation Area Photograph WA00031008	Stipulated	Disputed	FRE 402, 701, 802, F	
470	Recreation Area Photograph WA00031019	Stipulated	Disputed	FRE 402, 701, 802, F	
471	Recreation Area Photograph WA00030210	Stipulated	Disputed	FRE 402, 701, 802, F	
472	Recreation Area Photograph WA00030219	Stipulated	Disputed	FRE 402, 701, 802, F	
473	Grey Mile Photograph WA00029761	Stipulated	Stipulated		
474	Grey Mile Photograph WA00029881	Stipulated	Stipulated		
475	Grey Mile Photograph WA00030519	Stipulated	Stipulated		
476	Grey Mile Photograph WA00031156	Stipulated	Stipulated		
477	Clipboard with Grey Mile Duties WA00030731	Stipulated	Disputed	FRE 402, 701, 802, F	

478	Grey Mile Photograph WA00030394	Stipulated	Stipulated		
479	Grey Mile Photograph WA00030522	Stipulated	Stipulated		
480	Grey Mile Photograph WA00030523	Stipulated	Stipulated		
481	Grey Mile Photograph WA00030728	Stipulated	Stipulated		
482	Grey Mile Photograph WA00030729	Stipulated	Stipulated		
483	Grey Mile Photograph WA00030733	Stipulated	Stipulated		
484	Grey Mile Photograph WA00031086	Stipulated	Stipulated		
485	Grey Mile Photograph WA00031088	Stipulated	Stipulated		
486	Grey Mile Photograph WA00031089	Stipulated	Stipulated		
487	Grey Mile Photograph WA00031092	Stipulated	Stipulated		
488	Grey Mile Photograph WA00031094	Stipulated	Stipulated		
489	Grey Mile Photograph WA00031098	Stipulated	Stipulated		
490	Grey Mile Photograph WA00031100	Stipulated	Stipulated		
491	Grey Mile Photograph WA00031158	Stipulated	Stipulated		
492	Grey Mile Photograph WA00031159	Stipulated	Stipulated		
493	Grey Mile Photograph WA00031160	Stipulated	Stipulated		

494	Interior Photograph WA00030987	Stipulated	Disputed	FRE 402, 701, 802, F	
495	Interior Photograph WA00030999	Stipulated	Disputed	FRE 402, 701, 802, F	
496	Interior Photograph WA00031023	Stipulated	Disputed	FRE 402, 701, 802, F	
497	Interior Photograph WA00031033	Stipulated	Disputed	FRE 402, 701, 802, F	
498	Interior Photograph WA00031050	Stipulated	Disputed	FRE 402, 701, 802, F	
499	Interior Photograph WA00031063	Stipulated	Disputed	FRE 402, 701, 802, F	
500	Interior Photograph WA00031066	Stipulated	Disputed	FRE 402, 701, 802, F	
501	Interior Photograph WA00031068	Stipulated	Disputed	FRE 402, 701, 802, F	
502	Interior Photograph WA00031076	Stipulated	Disputed	FRE 402, 701, 802, F	
503	Interior Photograph WA00031079	Stipulated	Disputed	FRE 402, 701, 802, F	
504	Media Files – NWDC Tour – VIDEO ONLY KIRO_Tour.mp4	Stipulated	Disputed	FRE 402, 701, 802, F	
505	Media Files – NWDC Tour– VIDEO ONLY TNT_Tour.mp4	Stipulated	Disputed	FRE 402, 701, 802, F	
506	Media Files – NWDC Tour– VIDEO ONLY Univision_Tour.mp4	Stipulated	Disputed	FRE 402, 701, 802, F	
507	Media Files – NWDC Tour NWDC-Tour_Jennings_1	Stipulated	Disputed	FRE 402, 701, 802, F	
508	Media Files – NWDC Tour NWDC-Tour_Jennings_2	Stipulated	Disputed	FRE 402, 701, 802, F	
509	Media Files – NWDC Tour NWDC-Tour_Jennings_4	Stipulated	Disputed	FRE 402, 701, 802, F	

510	Media Files – NWDC Tour NWDC-Tour Jennings 8	Stipulated	Disputed	FRE 402, 701, 802, F	
511	Media Files – NWDC Tour NWDC-Tour Jennings 9	Stipulated	Disputed	FRE 402, 701, 802, F	
512	Media Files – NWDC Tour NWDC-Tour Jennings Holding-Cell	Stipulated	Disputed	FRE 402, 701, 802, F	
513	Media Files – NWDC Tour NWDC-Tour Jennings Inmates	Stipulated	Disputed	FRE 402, 701, 802, F	
514	Media Files – NWDC Tour NWDC-Tour Jennings Kitchen	Stipulated	Disputed	FRE 402, 701, 802, F	
515	Media Files – NWDC Tour NWDC-Tour Jennings Medical	Stipulated	Disputed	FRE 402, 701, 802, F	
516	Media Files – NWDC Tour NWDC-Tour Jennings Medical 2	Stipulated	Disputed	FRE 402, 701, 802, F	
517	Media Files – NWDC Tour SeattleTimes Photo 183649 ICETour	Stipulated	Disputed	FRE 402, 701, 802, F	
518	Media Files – NWDC Tour SeattleTimes Photo 2038522 ICETour	Stipulated	Disputed	FRE 402, 701, 802, F	
519	Photographs of the detainee living areas WA00030418	Stipulated	Disputed	FRE 402, 701, 802, F	
520	Photographs of the detainee living areas WA00030425	Stipulated	Disputed	FRE 402, 701, 802, F	
521	Photographs of the detainee living areas WA00030419	Stipulated	Disputed	FRE 402, 701, 802, F	
522	Photographs of the detainee living areas WA00030414	Stipulated	Disputed	FRE 402, 701, 802, F	
523	Photographs of the detainee living areas WA00030496	Stipulated	Disputed	FRE 402, 701, 802, F	
524	Photographs of the detainee living areas WA00030451	Stipulated	Disputed	FRE 402, 701, 802, F	
525	House Unit Photograph WA00030684	Stipulated	Disputed	FRE 402, 701, 802, F	

526	Kitchen Photograph WA00030632	Stipulated	Disputed	FRE 402, 701, 802, F	
527	Kitchen Photograph WA00030808	Stipulated	Disputed	FRE 402, 701, 802, F	
528	Kitchen Photograph WA00030075	Stipulated	Disputed	FRE 402, 701, 802, F	
529	Payroll Transactions 1/1/2013-2/1/2013 GEO-State 297977	Stipulated	Disputed	FRE 701, 802, F	
530	Payroll Transactions 5/1/2017-6/1/2017 GEO-State 298611	Stipulated	Disputed	FRE 701, 802, F	
531	Marquez-Zavalza Payroll Transactions 5/1/2017-6/1/2017	Stipulated	Disputed	F, T	
532	Payroll Transactions 6/1/2017-7/1/2017 GEO-State 298624	Stipulated	Disputed	FRE 701, 802, F	
533	Marquez-Zavalza Payroll Transactions 6/1/2017-7/1/2017	Stipulated	Disputed	F, T	
534	Payroll Transactions 8/1/2017-9/1/2017 GEO-State 298650	Stipulated	Disputed	FRE 701, 802, F	
535	Marquez-Zavalza Payroll Transactions 8/1/2017-9/1/2017	Stipulated	Disputed	F, T	
536	Payroll Transactions 9/1/2017-10/1/2017 GEO-State 298663	Stipulated	Disputed	FRE 701, 802, F	
537	Marquez-Zavalza Payroll Transactions 9/1/2017-10/1/2017	Stipulated	Disputed	F, T	
538	Payroll Transactions 10/1/2017-11/1/2017 GEO-State 298688	Stipulated	Disputed	FRE 701, 802, F	
539	Marquez-Zavalza Payroll Transactions 10/1/2017-11/1/2017	Stipulated	Disputed	F, T	
540	Payroll Transactions 2/1/2018-3/1/2018 GEO-State 297465	Stipulated	Disputed	FRE 701, 802, F	
541	Lopez-Paez Payroll Transactions 2/1/2018-3/1/2018	Stipulated	Disputed	T	

542	Payroll Transactions 4/1/2018-5/1/2018 GEO-State 297466	Stipulated	Disputed	FRE 701, 802, F	
543	Lopez-Paez Payroll Transactions 4/1/2018-5/1/2018	Stipulated	Disputed	T	
544	Payroll Transactions 5/1/2018-6/1/2018 GEO-State 297467	Stipulated	Disputed	FRE 701, 802, F	
545	Lopez-Paez Payroll Transactions 5/1/2018-6/1/2018	Stipulated	Disputed	T	
546	Payroll Transactions 6/1/2018-7/1/2018 GEO-State 297468	Stipulated	Disputed	FRE 701, 802, F	
547	Lopez-Paez Payroll Transactions 6/1/2018-7/1/2018	Stipulated	Disputed	T	
548	Payroll Transactions 07/1/2018-8/1/2018 GEO-State 297469	Stipulated	Disputed	FRE 701, 802, F	
549	Lopez-Paez Payroll Transactions 7/1/2018-8/1/2018	Stipulated	Disputed	T	
550	Payroll Transactions 10/1/2018-11/1/2018 GEO-State 297472	Stipulated	Disputed	FRE 701, 802, F	
551	Lopez-Paez Payroll Transactions 10/1/2018-11/1/2018	Stipulated	Disputed	T	
552	Payroll Transactions 2/1/2019-3/1/2019 GEO-State 297477	Stipulated	Disputed	FRE 701, 802, F	
553	Lopez-Paez Payroll Transactions 2/1/2019-3/1/2019	Stipulated	Disputed	T	
554	Payroll Transactions 5/1/2019-6/3/2019 GEO-State 297478	Stipulated	Disputed	FRE 701, 802, F	
555	Lopez-Paez Payroll Transactions 5/1/2018-6/3/2018	Stipulated	Disputed	T	
556	Payroll Transactions 6/1/2019-7/1/2019 GEO-State 297479	Stipulated	Disputed	FRE 701, 802, F	
557	Lopez-Paez Payroll Transactions 6/1/2018-7/1/2018	Stipulated	Disputed	T	

558	Payroll Transactions 7/1/2019-8/1/2019 GEO-State 297480	Stipulated	Disputed	FRE 701, 802, F	
559	Lopez-Paez Payroll Transactions 7/1/2018-8/1/2018	Stipulated	Disputed	T	
560	Payroll Transactions 9/1/2019-10/1/2019 GEO-State 297481	Stipulated	Disputed	FRE 701, 802, F	
561	Lopez-Paez Payroll Transactions 9/1/2018-10/1/2018	Stipulated	Disputed	T	
562	Second Supplemental Expert Report of Peter Nickerson, Ph.D.	Stipulated	Disputed	FRE 402, 702, 802, 609, F	
563	Appendix A to Nickerson Second Supplemental Report (CV, firm descriptions, prior testimony)	Stipulated	Disputed	FRE 402, 702, 802, 609, F	
564	Appendix B to Nickerson Second Supplemental Report (List of files reviewed)	Stipulated	Disputed	FRE 402, 702, 802, 609, F	
565	Attachment 1 to Nickerson Second Supplemental Report (Dep. Exhibit 20)	Stipulated	Disputed	FRE 402, 702, 802, 609, F	
566	Attachment 2 to Nickerson Second Supplemental Report (List of Data Sources for Amounts Paid to Detainees) Cumulative Summary	Stipulated	Disputed	FRE 402, 702, 802, 609, F	
567	Attachment 3 to Nickerson Second Supplemental Report (Washington Minimum Wage by Year) Cumulative Summary	Stipulated	Disputed	FRE 402, 702, 802, 609, F	
568	Attachment 4 to Nickerson Second Supplemental Report (Prevailing Wages –occupation, mapping, date, wage, and source) Cumulative Summary	Stipulated	Disputed	FRE 402, 702, 802, 609, F	

569	Attachment 5 to Nickerson Second Supplemental Report (Dep. Exhibit 20 - Annotated with occupational categories and additional details with shift length estimates)	Stipulated	Disputed	FRE 402, 702, 802, 609, F	
570	Attachment 6 to Nickerson Second Supplemental Report (Percentage of Total Hours Worked by Occupation and the Applicable Prevailing Wage for January 1, 2013 – September 30, 2019)	Stipulated	Disputed	FRE 402, 702, 802, 609, F	
571	Attachment 7 to Nickerson Second Supplemental Report (Fair Wage Analysis: January 1, 2013 to September 30, 2019)	Stipulated	Disputed	FRE 402, 702, 802, 609, F	
572	Attachment 8 to Nickerson Second Supplemental Report (Fair Wage Analysis: October 1, 2005 to December 31, 2012)	Stipulated	Disputed	FRE 402, 702, 802, 609, F	
573	Attachment 9 to Nickerson Second Supplemental Report (Fair Wage Analysis: October 1, 2019 to April 10, 2020)	Stipulated	Disputed	FRE 402, 702, 802, 609, F	
574	Attachment 10 to Nickerson Second Supplemental Report (Fair Wage Analysis by Year)	Stipulated	Disputed	FRE 402, 702, 802, 609, F	
575	Attachment 11.1 to Nickerson Second Supplemental Report (WA Minimum Wage Effects)	Stipulated	Disputed	FRE 402, 702, 802, 609, F	
576	Attachment 11.2 to Nickerson Second Supplemental Report (Prevailing Wage Effects)	Stipulated	Disputed	FRE 402, 702, 802, 609, F	

577	Attachment 12 to Nickerson Second Supplemental Report (GEO-State 299185)	Stipulated	Disputed	FRE 402, 702, 802, 609, F	
578	Attachment 13.1 to Nickerson Second Supplemental Report (Actual Revenue and Gross Profit for NWDC Compared to Revenue and Gross Profit Adjusted for Additional Cost of Fair Wages)	Stipulated	Disputed	FRE 402, 702, 802, 609, F	
579	Attachment 13.2 to Nickerson Second Supplemental Report (Actual Revenue and Net Profit for NWDC Compared to Revenue and Net Profit Adjusted for Additional Cost of Fair Wages)	Stipulated	Disputed	FRE 402, 702, 802, 609, F	
580	Attachment 13.3 to Nickerson Second Supplemental Report (Actual Revenue and Gross Profit for NWDC Compared to Revenue and Gross Profit Adjusted for Additional Cost of Minimum Wages and FICA)	Stipulated	Disputed	FRE 402, 702, 802, 609, F	
581	Attachment 13.4 to Nickerson Second Supplemental Report (Actual Revenue and Net Profit for NWDC Compared to Revenue and Net Profits Adjusted for Additional Cost of Minimum Wages and FICA)	Stipulated	Disputed	FRE 402, 702, 802, 609, F	
585	House Unit Photograph WA00030440	Stipulated	Disputed	FRE 402, 701, 802, F	
586	House Unit Photograph WA00030442	Stipulated	Disputed	FRE 402, 701, 802, F	
587	House Unit Photograph WA00030449	Stipulated	Disputed	FRE 402, 701, 802, F	
588	House Unit Photograph WA00030452	Stipulated	Disputed	FRE 402, 701, 802, F	
589	House Unit Photograph WA00030467	Stipulated	Disputed	FRE 402, 701, 802, F	

590	House Unit Photograph WA00030473	Stipulated	Disputed	FRE 402, 701, 802, F	
591	House Unit Photograph WA00030485	Stipulated	Disputed	FRE 402, 701, 802, F	
592	House Unit Photograph WA00030505	Stipulated	Disputed	FRE 402, 701, 802, F	
593	House Unit Photograph WA00030509	Stipulated	Disputed	FRE 402, 701, 802, F	
594	House Unit Photograph WA00030530	Stipulated	Disputed	FRE 402, 701, 802, F	
595	House Unit Photograph WA00030542	Stipulated	Disputed	FRE 402, 701, 802, F	
596	House Unit Photograph WA00030598	Stipulated	Disputed	FRE 402, 701, 802, F	
597	House Unit Photograph WA00030603	Stipulated	Disputed	FRE 402, 701, 802, F	
598	House Unit Photograph WA00030623	Stipulated	Disputed	FRE 402, 701, 802, F	
599	House Unit Photograph WA00030661	Stipulated	Disputed	FRE 402, 701, 802, F	

Parties' Objection Codes

C. Confidential. GEO objects to the admissibility of certain confidential documents (or pages of documents), but is amenable to stipulating to their admissibility at trial, provided the confidentiality can be preserved outside of the courtroom.

F. Foundation.

MIL. The party objects based upon a MIL ruling.

T. Testimony. GEO has disputed the admissibility of certain documents, but will stipulate to their admissibility provided the witness testifies at trial and is available for cross-examination.

Defendant's Exhibits

Ex. #	Description	Authenticity	Admissibility	Objection	Admitted
A-1	Email thread between Tammy Fellin and other L&I employees GEO-Nwauzor 191936 WA00009253	Stipulated	Disputed	FRE 402, 403, 701, 802, F	
A-2	Email thread between Tammy Fellin and Sandy Mullin GEO-Nwauzor 192040 GEO-Nwauzor 192250	Stipulated	Disputed	FRE 402, 403, 701, 802, F	
A-3	Email thread between Tammy Fellin and Sandy Mullin GEO-Nwauzor 192142	Stipulated	Disputed	FRE 402, 403, 701, 802, F	
A-4	Email from Fellin to Mullin WA00009361	Stipulated	Disputed	FRE 402, 403, 701, 802, F	
A-5	Email from Orlando Marquez Washington AG's office. WA00003618	Stipulated	Disputed	FRE 402, 403, 802	
A-7	Memo from City of Tacoma WA00005404	Disputed	Disputed	FRE 402, 403, 701, 802, F	
A-8	Email from Sandy Mullins re: applicability of WMWA to detainees WA00009260	Stipulated	Disputed	FRE 402, 403, 802, F	
A-9	GEO's 2017 Business License Renewal (City of Tacoma) WA00006606	Disputed	Disputed	FRE 402, 403, 802, 902, F	
A-10	Letter from ICE to City of Tacoma WA00002514	Disputed	Disputed	FRE 402, 403, 802, F	

Ex. #	Description	Authenticity	Admissibility	Objection	Admitted
A-12	Email to Bill Pfeifer from Lauren Walker Lee, Tacoma City Counsel. WA00008106	Disputed	Disputed	FRE 402, 403, 802, F	
A-14	Special Commitment Center Residential Vocational Program Policy WA00011892-902	Stipulated	Disputed	FRE 402, 403, 802, F	
A-15	Eastern State Hospital Work Program Manual WA00011890-891	Stipulated	Disputed	FRE 402, 403, 802, F	
A-16	Position Description "Custodian 5" WA00011886-889	Stipulated	Disputed	FRE 402, 403, 802, F	
A-17	Position Descriptions for "Custodian 4" WA00011853-885	Stipulated	Disputed	FRE 402, 403, 802, F	
A-18	Positions for Food Service and Laundry WA00011849—852	Disputed	Disputed	FRE 402, 403, 802, F	
A-19	FY19 Class 3 and 4 Offender Hours WA00011742	Disputed	Disputed	FRE 402, 403, 802, F	
A-20	FY18 Class 3 and 4 Offender Hours WA00011587	Disputed	Disputed	FRE 402, 403, 802, F	
A-21	Washington State Penitentiary Orientation Manual (2014) WA00011566-586	Stipulated	Disputed	FRE 402, 403, 802, F	
A-22	Statewide Inmate Orientation Handbook WA00011496-565	Stipulated	Disputed	FRE 402, 403, 802, F	

Ex. #	Description	Authenticity	Admissibility	Objection	Admitted
A-23	GEO's Contract with the Washington Department of Corrections (May 2015) WA00011357-495	Disputed	Disputed	FRE 402, 403, 802, F	
A-24	Gratuity Postings 2005-2018 WA00011272	Disputed	Disputed	FRE 402, 403, 802, F	
A-25	Correctional Industries Class II Employment (2014) WA00011235-1244	Stipulated	Disputed	FRE 402, 403, 802, F	
A-26	Correctional Industries Class II Employment (2011) WA00011213-1223	Stipulated	Disputed	FRE 402, 403, 802, F	
A-27	Correctional Industries Class II Employment (2010) WA00011192-201	Stipulated	Disputed	FRE 402, 403, 802, F	
A-28	Correctional Industries Class II Employment (2000) WA00011177-185	Stipulated	Disputed	FRE 402, 403, 802, F	
A-29	Correctional Industries Class II Employment (2016) WA00011166-176	Stipulated	Disputed	FRE 402, 403, 802, F	
A-30	Correctional Industries Class III Employment (2011) WA00011103-108	Stipulated	Disputed	FRE 402, 403, 802, F	
A-31	Correctional Industries Class III Employment (2008) WA00011098-102	Stipulated	Disputed	FRE 402, 403, 802, F	
A-32	Correctional Industries Class III Employment (2007) WA00011093-097	Stipulated	Disputed	FRE 402, 403, 802, F	

Ex. #	Description	Authenticity	Admissibility	Objection	Admitted
A-33	Correctional Industries Class III Employment (2006) WA00011088-092	Stipulated	Disputed	FRE 402, 403, 802, F	
A-34	Correctional Industries Class III Employment (2000) WA00011080-082	Stipulated	Disputed	FRE 402, 403, 802, F	
A-35	Correctional Industries Class III Employment (2016) WA00011074-079	Stipulated	Disputed	FRE 402, 403, 802, F	
A-36	Work Programs for Offenders (2011) WA00011066-073	Stipulated	Disputed	FRE 402, 403, 802, F	
A-37	Work Programs for Offenders (2008) WA00011062-65	Stipulated	Disputed	FRE 402, 403, 802, F	
A-38	Work Programs for Offenders (2007) WA00011058-61	Stipulated	Disputed	FRE 402, 403, 802, F	
A-39	Work Programs for Offenders (2006) WA00011046-49	Stipulated	Disputed	FRE 402, 403, 802, F	
A-40	Work Programs for Offenders (2010) WA00011023	Stipulated	Disputed	FRE 402, 403, 802, F	
A-41	Work Programs for Offenders (2016) WA00011015-022	Stipulated	Disputed	FRE 402, 403, 802, F	

A-42	Class III Offender Employment and Compensation (2014) WA00010986-993 WA00010488-493	Stipulated	Disputed	FRE 402, 403, 802, F	
A-43	Correctional Industries Class II Employment (2007) WA00010936-963	Stipulated	Disputed	FRE 402, 403, 802, F	
A-44	Washington DOC Food Services Program WA00009923-932	Stipulated	Disputed	FRE 402, 403, 802, F	
A-45	Education and Vocational Programs for Offenders WA00009985-995	Stipulated	Disputed	FRE 402, 403, 802, F	
A-46	Offender Financial Responsibility (2012) WA00009996	Disputed	Disputed	FRE 402, 403, 802, F	
A-47	Correctional Industries Quarterly Detail Statements 10/2016- 12/2016 WA00010003-13	Disputed	Disputed	FRE 402, 403, 802, F	
A-48	Correctional Industries Quarterly Detail Statements 1/2018- 4/2018 WA00010014-10034	Disputed	Disputed	FRE 402, 403, 802, F	
A-49	Correctional Industries Quarterly Detail Statements 10/2017- 1/2018 WA00010035-36	Disputed	Disputed	FRE 402, 403, 802, F	
A-50	Correctional Industries Quarterly Detail Statements 10/2016 -12/2016 WA00010037-46	Disputed	Disputed	FRE 402, 403, 802, F	
A-51	Work Programs for Offenders (2016) WA00010053-60	Stipulated	Disputed	FRE 402, 403, 802, F	

A-52	Class III Offender Employment and Compensation (2016) WA00010061-66	Stipulated	Disputed	FRE 402, 403, 802, F	
A-53	Correctional Industries Class II Employment (2016) WA00010089-99	Stipulated	Disputed	FRE 402, 403, 802, F	
A-54	Correctional Industries Annual Report (2017) WA00010148-179	Stipulated	Disputed	FRE 402, 403, 802, F	
A-55	About Washington State Correctional Industries WA00010182-83	Stipulated	Disputed	FRE 402, 403, 802, F	
A-56	"Our Mission" Correctional Industries WA00010184-85	Stipulated	Disputed	FRE 402, 403, 802, F	
A-57	Correctional Industries Quarterly Detail Statements 10/2017-12/2017 WA00010186-205	Disputed	Disputed	FRE 402, 403, 802, F	
A-58	Correctional Industries Quarterly Detail Statements 4/2017-6/2017 WA00010206-224	Disputed	Disputed	FRE 402, 403, 802, F	
A-59	Correctional Industries Quarterly Detail Statements 7/2017-9/2017 WA00010225	Disputed	Disputed	FRE 402, 403, 802, F	
A-60	Correctional Industries Class I Partnerships WA00010247-48	Stipulated	Disputed	FRE 402, 403, 802, F	
A-61	Class III Offender Employment and Compensation (2017) WA00010420-451	Stipulated	Disputed	FRE 402, 403, 802, F	
A-62	Work Programs for Offenders (2016) WA00010452-463	Stipulated	Disputed	FRE 402, 403, 802, F	

A-63	Class II Offender Employment and Compensation (2014) WA00010498-505	Stipulated	Disputed	FRE 402, 403, 802, F	
A-64	Class III Inmate Employment and Compensation (2009) WA00010506-527	Stipulated	Disputed	FRE 402, 403, 802, F	
A-65	Class III Employment and Compensation (2005) WA00010528-539	Stipulated	Disputed	FRE 402, 403, 802, F	
A-66	Class III Inmate Employment and Compensation (2006) WA00010548-567	Stipulated	Disputed	FRE 402, 403, 802, F	
A-67	Class III Inmate Employment and Compensation (2007) WA00010568-593	Stipulated	Disputed	FRE 402, 403, 802, F	
A-68	Class III Inmate Employment and Compensation (2016) WA00010594-601	Stipulated	Disputed	FRE 402, 403, 802, F	
A-69	Class III Inmate Employment and Compensation (2008) WA00010602-621	Stipulated	Disputed	FRE 402, 403, 802, F	
A-70	Class III Inmate Employment and Compensation (2013) WA00010622-633	Stipulated	Disputed	FRE 402, 403, 802, F	
A-71	Class III Inmate Employment and Compensation (2011) WA00010634-653	Stipulated	Disputed	FRE 402, 403, 802, F	
A-72	Correctional Industries Class II Employment (2005) WA00010770-797	Stipulated	Disputed	FRE 402, 403, 802, F	
A-73	Correctional Industries Class II Employment (2016) WA00010798-819	Stipulated	Disputed	FRE 402, 403, 802, F	

A-74	Correctional Industries Class II Employment (2010) WA00010820-845	Stipulated	Disputed	FRE 402, 403, 802, F	
A-75	Correctional Industries Class II Employment (2006) WA00010846-885	Stipulated	Disputed	FRE 402, 403, 802, F	
A-76	Correctional Industries Class II Employment (2011) WA00010886-935	Stipulated	Disputed	FRE 402, 403, 802, F	
A-77	Correctional Industries Class II Employment (2014) WA00010964-985	Stipulated	Disputed	FRE 402, 403, 802, F	
A-78	Work Programs for Offenders (2010) WA00011023-026	Stipulated	Disputed	FRE 402, 403, 802, F	
A-79	Work Programs for Offenders (2011) WA00011027-033	Stipulated	Disputed	FRE 402, 403, 802, F	
A-80	Work Programs for Offenders (2010) WA00011034-039	Stipulated	Disputed	FRE 402, 403, 802, F	
A-81	Work Programs for Offenders (2010) WA00011040-045	Stipulated	Disputed	FRE 402, 403, 802, F	
A-82	Work Programs for Offenders (2011) WA00011050-057	Stipulated	Disputed	FRE 402, 403, 802, F	
A-83	Class III Offender Employment and Compensation (2008) WA00011083-87	Stipulated	Disputed	FRE 402, 403, 802, F	
A-84	Class III Offender Employment and Compensation (2008) WA00011098-102	Stipulated	Disputed	FRE 402, 403, 802, F	

A-85	Class III Offender Employment and Compensation (2011) WA00011103-108	Stipulated	Disputed	FRE 402, 403, 802, F	
A-86	Offender Worker Positions and Compensation (2000) WA00011186-191	Stipulated	Disputed	FRE 402, 403, 802, F	
A-87	Correctional Industries Class II Employment (2006) WA00011202-212	Stipulated	Disputed	FRE 402, 403, 802, F	
A-88	Correctional Industries Class II Employment (2007) WA00011224-234	Stipulated	Disputed	FRE 402, 403, 802, F	
A-89	CCA's Contract with the Washington Department of Corrections (September 2014) WA00011308-356	Disputed	Disputed	FRE 402, 403, 802, F	
A-90	Monroe Correctional Complex Segregation Handbook WA00011916	Stipulated	Disputed	FRE 402, 403, 802, F	
A-91	MCC Minimum Security Unit Offender Orientation Manual (2016) WA00011931-949	Stipulated	Disputed	FRE 402, 403, 802, F	
A-92	Monroe Correctional Complex Special Offender Unit WA00011950-968	Stipulated	Disputed	FRE 402, 403, 802, F	
A-93	Monroe Correctional Complex Twin Rivers Unit Handbook WA00011969-985	Stipulated	Disputed	FRE 402, 403, 802, F	
A-94	Monroe Correctional Complex Washington State Reformatory Unit Handbook WA00011986-995	Stipulated	Disputed	FRE 402, 403, 802, F	

A-95	Department of Corrections Job Flyer WA00012021	Stipulated	Disputed	FRE 402, 403, 802, F	
A-96	Invitation for Applications For Monroe Correctional Complex WA00012150-181	Stipulated	Disputed	FRE 402, 403, 802, F	
A-97	DOC Employment Flyer WA00012272	Stipulated	Disputed	FRE 402, 403, 802, F	
A-98	Interagency Contract with Puyallup Tribal Police Department WA00012397-411	Stipulated	Disputed	FRE 402, 403, 802, F	
A-99	Interagency Agreement Chelan County and Washington State Department of Corrections (2018) WA00012433-455	Stipulated	Disputed	FRE 402, 403, 802, F	
A-100	Interagency Agreement King County and Washington State Department of Corrections (2013) WA00013182-220	Stipulated	Disputed	FRE 402, 403, 802, F	
A-101	Interagency Agreement between the Confederated Tribes of Chehalis and the Washington Department of Corrections (2016) WA00013489-529	Stipulated	Disputed	FRE 402, 403, 802, F	
A-102	Progress House Work Release Contract (2017) WA00014335-367	Stipulated	Disputed	FRE 402, 403, 802, F	
A-103	Helen B. Ratcliff Work Release Contract (2017) WA00014368-396	Stipulated	Disputed	FRE 402, 403, 802, F	
A-104	Bishop Lewis Work Release Contract (2017) WA00014429-459	Stipulated	Disputed	FRE 402, 403, 802, F	

A-105	Letter from Inslee to Office of the Inspector General WA00014565	Stipulated	Disputed	FRE 402, 403, 802, F	
A-106	Email from Suchi Sharma to Lynne Buchanan WA00015595-596	Stipulated	Disputed	FRE 402, 403, 701, 802, F	
A-107	Email from Lynne Buchanan to Elizabeth Smith, March 11, 2014 WA00015597-598	Stipulated	Disputed	FRE 402, 403, 701, 802, F	
A-108	Email from Joel Sacks to Tammy Fellin WA00015611	Stipulated	Disputed	FRE 402, 403, 701, 802, F	
A-109	Email from Lynne Buchanan to David Johnson WA00017694	Stipulated	Disputed	FRE 402, 403, 701, 802, F	
A-110	Email from Tammy Fellin to Sandy Mullin (4.14.2014) WA00017738	Stipulated	Disputed	FRE 402, 403, 701, 802, F	
A-111	WSH Patient Worker Pay FY 2013 WA00017921	Disputed	Disputed	FRE 402, 403, 802, F	
A-112	WSH Patient Worker Pay FY 2014 WA00017922	Disputed	Disputed	FRE 402, 403, 802, F	
A-113	WSH Patient Worker Pay FY 2015 WA00017923	Disputed	Disputed	FRE 402, 403, 802, F	
A-114	WSH Patient Worker Pay FY 2016 WA00017924	Disputed	Disputed	FRE 402, 403, 802, F	
A-115	Email from Suchi Sharma to Suchi Sharma WA00017955	Stipulated	Disputed	FRE 402, 403, 701, 802, F	
A-116	Email from Matthew Erlich to Carlena Anderson (5.28.14) WA00018810	Stipulated	Disputed	FRE 402, 403, 701, 802, F	

A-117	Email from Suchi Sharma to Tammy Fellin WA00019175	Stipulated	Disputed	FRE 402, 403, 701, 802, F	
A-118	Email from David Johnson to Melissa Grondahl (5.4.2016) WA00019244	Stipulated	Disputed	FRE 402, 403, 701, 802, F	
A-119	Airway Heights Corrections Center Operational Memorandum: Class III Employment and Compensation (2008) WA00020417-441	Stipulated	Disputed	FRE 402, 403, 802, F	
A-120	Airway Heights Corrections Center Operational Memorandum: Class III Employment and Compensation (2008) WA00020442-462	Stipulated	Disputed	FRE 402, 403, 802, F	
A-121	Airway Heights Corrections Center Operational Memorandum: Class III Employment and Compensation (2009) WA00020463-483	Stipulated	Disputed	FRE 402, 403, 802, F	
A-122	Airway Heights Corrections Center Operational Memorandum: Class III Employment and Compensation (2011) WA00020484-492	Stipulated	Disputed	FRE 402, 403, 802, F	
A-123	Airway Heights Corrections Center Operational Memorandum: Class III Employment and Compensation (2009) WA00020493-513	Stipulated	Disputed	FRE 402, 403, 802, F	

A-124	RPM Positions WA00020515	Disputed	Disputed	FRE 402, 403, 802, F	
A-125	Airway Heights Corrections Center Jobs Department WA00020518-521	Stipulated	Disputed	FRE 402, 403, 802, F	
A-126	Airway Heights Corrections Center Jobs Department WA00020522-525	Stipulated	Disputed	FRE 402, 403, 802, F	
A-127	Airway Heights Corrections Center Jobs Department WA00020526-529	Stipulated	Disputed	FRE 402, 403, 802, F	
A-128	Airway Heights Corrections Center Job Responsibilities WA00020536	Stipulated	Disputed	FRE 402, 403, 802, F	
A-129	Airway Heights Corrections Center Job Application WA00020538-539	Stipulated	Disputed	FRE 402, 403, 802, F	
A-130	Airway Heights Corrections Center Job Application WA00020540-541	Stipulated	Disputed	FRE 402, 403, 802, F	
A-131	Airway Heights Corrections Center Work Programs for Offenders WA00020550-557	Stipulated	Disputed	FRE 402, 403, 802, F	
A-132	Airway Heights Corrections Center Operational Memorandum: Class III Employment (2006) WA00020558-567	Stipulated	Disputed	FRE 402, 403, 802, F	
A-133	Airway Heights Corrections Center Operational Memorandum: Class III Employment and Compensation (2007) WA00020568-577	Stipulated	Disputed	FRE 402, 403, 802, F	

A-134	Airway Heights Corrections Center Class II Job Aid WA00020578-586	Stipulated	Disputed	FRE 402, 403, 802, F	
A-135	Airway Heights Corrections Center Criteria for Job Classes WA00020587-591	Stipulated	Disputed	FRE 402, 403, 802, F	
A-136	Airway Heights Corrections Center Operational Memorandum: Class III Employment (2010) WA00020641-651	Stipulated	Disputed	FRE 402, 403, 802, F	
A-137	Airway Heights Corrections Center Operational Memorandum: Class II Employment (2015) WA00020652-664	Stipulated	Disputed	FRE 402, 403, 802, F	
A-138	Airway Heights Corrections Center Operational Memorandum: Class II Employment (2011) WA00020688-701	Stipulated	Disputed	FRE 402, 403, 802, F	
A-139	Email from David Johnson to Russell Hauss WA00019297	Stipulated	Disputed	FRE 402, 403, 701, 802, F	
A-140	Airway Heights Corrections Center Operational Memorandum: Class III Employment and Compensation (2016) WA00020764-771	Stipulated	Disputed	FRE 402, 403, 802, F	
A-141	Clallum Bay Corrections Center Operational Memorandum: Class III Employment and Compensation (2012) WA00020775-783	Stipulated	Disputed	FRE 402, 403, 802, F	

A-142	Clallum Bay Corrections Center Operational Memorandum: Class III Employment and Compensation (2014) WA00020784-790	Stipulated	Disputed	FRE 402, 403, 802, F	
A-143	Clallum Bay Corrections Center Operational Memorandum: Class III Employment and Compensation (2012) WA00020791-796	Stipulated	Disputed	FRE 402, 403, 802, F	
A-144	Clallum Bay Corrections Center Operational Memorandum: Class III Employment and Compensation (2012) WA00020797-802	Stipulated	Disputed	FRE 402, 403, 802, F	
A-145	Clallum Bay Corrections Center Operational Memorandum: Class III Employment and Compensation (2009) WA00020803-810	Stipulated	Disputed	FRE 402, 403, 802, F	
A-146	Clallum Bay Corrections Center Operational Memorandum: Class III Employment and Compensation (2011) WA00020811-817	Stipulated	Disputed	FRE 402, 403, 802, F	
A-147	Clallum Bay Corrections Center Operational Memorandum: Class III Employment and Compensation (2016) WA00020834-840	Stipulated	Disputed	FRE 402, 403, 802, F	

A-148	Clallum Bay Corrections Center Operational Memorandum: Class III Employment and Compensation (2006) WA00020841-843	Stipulated	Disputed	FRE 402, 403, 802, F	
A-149	Clallum Bay Corrections Center Operational Memorandum: Class III Employment and Compensation (2007) WA00020844-847	Stipulated	Disputed	FRE 402, 403, 802, F	
A-150	Clallum Bay Corrections Center Operational Memorandum: Class III Employment and Compensation (2008) WA00020848-851	Stipulated	Disputed	FRE 402, 403, 802, F	
A-151	Clallum Bay Corrections Center Hiring/Firing Practices WA00020868-869	Stipulated	Disputed	FRE 402, 403, 802, F	
A-152	Dayroom Janitor Job Description WA00020870	Disputed	Disputed	FRE 402, 403, 802, F	
A-153	Clallam Bay Initial Security Assessment WA00020874	Stipulated	Disputed	FRE 402, 403, 802, F	
A-154	Clallum Bay Corrections Center Operational Memorandum: Class III Employment and Compensation (2016) WA00020875-881	Stipulated	Disputed	FRE 402, 403, 802, F	
A-155	Clallum Bay Corrections Center Hiring/Firing Practices WA00020882-885	Stipulated	Disputed	FRE 402, 403, 802, F	

A-156	Clallum Bay Corrections Center Oddender Raises and Evaluations WA00020888	Stipulated	Disputed	FRE 402, 403, 802, F	
A-157	Clallum Bay Corrections Center Hiring/Firing Practices WA00020889-891	Stipulated	Disputed	FRE 402, 403, 802, F	
A-158	Clallum Bay Corrections Center Operational Memorandum: Class III Employment (2012) WA00020897-908	Stipulated	Disputed	FRE 402, 403, 802, F	
A-159	Clallum Bay Corrections Center Operational Memorandum: Class II Employment (2016) WA00020935-946 WA00020947-958	Stipulated	Disputed	FRE 402, 403, 802, F	
A-160	Cedar Creek Corrections Center Operational Memorandum: Class III Employment and Compensation (2011) WA00020978-985	Stipulated	Disputed	FRE 402, 403, 802, F	
A-161	Cedar Creek Corrections Center Operational Memorandum: Class II Employment (2014) WA00020986-21002	Stipulated	Disputed	FRE 402, 403, 802, F	
A-162	Cedar Creek Corrections Center Operational Memorandum: Class II Employment and Compensation (2010) WA00021003-21013	Stipulated	Disputed	FRE 402, 403, 802, F	
A-163	Class III Offender Employment and Compensation (2016) WA00021029-1034	Stipulated	Disputed	FRE 402, 403, 802, F	

A-164	Correctional Industries Class II Employment (2011) WA00021042-1052	Stipulated	Disputed	FRE 402, 403, 802, F	
A-165	Cedar Creek Corrections Center Operational Memorandum: Class III Employment and Compensation (2008) WA00021053-21057	Stipulated	Disputed	FRE 402, 403, 802, F	
A-166	Cedar Creek Corrections Center Operational Memorandum: Class III Employment and Compensation (2010) WA00021058-21072	Stipulated	Disputed	FRE 402, 403, 802, F	
A-167	Coyote Ridge Corrections Center Operational Memorandum: Work Programs For Offenders WA00021105-21115	Stipulated	Disputed	FRE 402, 403, 802, F	
A-168	Coyote Ridge Corrections Center Offender Employment Procedure WA00021120-127	Stipulated	Disputed	FRE 402, 403, 802, F	
A-169	Coyote Ridge Corrections Center Offender Employment Procedure WA00021128-136	Stipulated	Disputed	FRE 402, 403, 802, F	
A-170	Coyote Ridge Corrections Center Operational Memorandum: Work Programs For Offenders (2014) WA00021154-160	Stipulated	Disputed	FRE 402, 403, 802, F	
A-171	Coyote Ridge Corrections Center Operational Memorandum: Work Programs For Offenders (2013) WA00021161-166	Stipulated	Disputed	FRE 402, 403, 802, F	

A-172	Coyote Ridge Corrections Center Operational Memorandum: Work Programs For Offenders (2014) WA00021167-174	Stipulated	Disputed	FRE 402, 403, 802, F	
A-173	Coyote Ridge Corrections Center Operational Memorandum: Work Programs For Offenders (2014) WA00021175-181	Stipulated	Disputed	FRE 402, 403, 802, F	
A-174	Coyote Ridge Corrections Center Operational Memorandum: Class II Employment (2011) WA00021255-265	Stipulated	Disputed	FRE 402, 403, 802, F	
A-175	Coyote Ridge Corrections Center Operational Memorandum: Class II Employment (2014) WA00021273-284	Stipulated	Disputed	FRE 402, 403, 802, F	
A-176	Coyote Ridge Corrections Center Operational Memorandum: Class II Employment (2007) WA00021285-287	Stipulated	Disputed	FRE 402, 403, 802, F	
A-177	Coyote Ridge Corrections Center Operational Memorandum: Class II Employment (2014) WA00021292-303	Stipulated	Disputed	FRE 402, 403, 802, F	
A-178	Coyote Ridge Corrections Center Operational Memorandum: Class II Employment (2016) WA00021304-315	Stipulated	Disputed	FRE 402, 403, 802, F	
A-179	Larch Corrections Center Operational Memorandum: Class III Employment and Compensation (2011) WA00021361-383	Stipulated	Disputed	FRE 402, 403, 802, F	

A-180	Larch Corrections Center Operational Memorandum: Class III Offender Employment and Compensation (2012) WA00021384-386	Stipulated	Disputed	FRE 402, 403, 802, F	
A-181	Larch Corrections Center Operational Memorandum: Class III Offender Employment and Compensation (2016) WA00021387-393	Stipulated	Disputed	FRE 402, 403, 802, F	
A-182	Larch Corrections Center Operational Memorandum: Class III Offender Employment and Compensation (2018) WA00021403-409	Stipulated	Disputed	FRE 402, 403, 802, F	
A-183	Larch Corrections Center Operational Memorandum: Class III Offender Employment and Compensation (2013) WA00021430-440	Stipulated	Disputed	FRE 402, 403, 802, F	
A-184	Larch Corrections Center Operational Memorandum: Class II Offender Employment (2014) WA00021441-451	Stipulated	Disputed	FRE 402, 403, 802, F	
A-185	Larch Corrections Center Operational Memorandum: Class II Offender Employment (2016) WA00021452-462	Stipulated	Disputed	FRE 402, 403, 802, F	
A-186	Mission Creek Corrections: Offender Porters (2014) WA00021463-467	Stipulated	Disputed	FRE 402, 403, 802, F	

A-187	Mission Creek Corrections: Offender Porters (2017) WA00021468-472	Stipulated	Disputed	FRE 402, 403, 802, F	
A-188	Mission Creek Corrections Center Operational Memorandum: Class III Offender Employment and Compensation (2017) WA00021473-478	Stipulated	Disputed	FRE 402, 403, 802, F	
A-189	Mission Creek Corrections Center Operational Memorandum: Class III Offender Employment and Compensation (2016) WA00021479-484	Stipulated	Disputed	FRE 402, 403, 802, F	
A-190	Olympic Corrections Center: Work Programs for Offenders WA00021549-564	Stipulated	Disputed	FRE 402, 403, 802, F	
A-191	Olympic Corrections Center Operational Memorandum: Class III Offender Employment and Compensation (2017) WA00021573-578	Stipulated	Disputed	FRE 402, 403, 802, F	
A-192	Olympic Corrections Center Operational Memorandum: Class III Offender Employment and Compensation (2008) WA00021586-591	Stipulated	Disputed	FRE 402, 403, 802, F	
A-193	Olympic Corrections Center Operational Memorandum: Class III Offender Employment and Compensation (2009) WA00021592-597	Stipulated	Disputed	FRE 402, 403, 802, F	

A-194	Olympic Corrections Center Operational Memorandum: Class III Offender Employment (2015) WA00021618-629	Stipulated	Disputed	FRE 402, 403, 802, F	
A-195	Olympic Corrections Center Operational Memorandum: Class III Offender Employment (2016) WA00021630-640	Stipulated	Disputed	FRE 402, 403, 802, F	
A-196	Stafford Creek Corrections Center Operational Memorandum: Class III Offender Employment (2009) WA00021648-656	Stipulated	Disputed	FRE 402, 403, 802, F	
A-197	Stafford Creek Corrections Center Operational Memorandum: Class III Offender Employment (2016) WA00021672-681	Stipulated	Disputed	FRE 402, 403, 802, F	
A-198	Stafford Creek Corrections Center Operational Memorandum: Class III Offender Employment (2009) WA00021682-689	Stipulated	Disputed	FRE 402, 403, 802, F	
A-199	Stafford Creek Corrections Center Operational Memorandum: Class III Offender Employment (2011) WA00021690-696	Stipulated	Disputed	FRE 402, 403, 802, F	
A-200	Stafford Creek Corrections Center Operational Memorandum: Class III Offender Employment (2013) WA00021701-714	Stipulated	Disputed	FRE 402, 403, 802, F	
A-201	Stafford Creek Corrections Center Operational Memorandum: Class II Offender Employment (2006) WA00021808-825	Stipulated	Disputed	FRE 402, 403, 802, F	

A-202	Stafford Creek Corrections Center Operational Memorandum: Class II Offender Employment (2014) WA00021826-836	Stipulated	Disputed	FRE 402, 403, 802, F	
A-203	Stafford Creek Corrections Center Operational Memorandum: Class II Offender Employment (2016) WA00021837-847	Stipulated	Disputed	FRE 402, 403, 802, F	
A-204	Washington Corrections Center Operational Memorandum: Class II Offender Employment (2017) WA00021860-870	Stipulated	Disputed	FRE 402, 403, 802, F	
A-205	Washington Corrections Center Operational Memorandum: Class III Offender Employment (2016) WA00021871-882	Stipulated	Disputed	FRE 402, 403, 802, F	
A-206	Washington Corrections Center Operational Memorandum: Class III Employment and Compensation (2011) WA00021883-890	Stipulated	Disputed	FRE 402, 403, 802, F	
A-207	Washington Corrections Center Operational Memorandum: Class III Employment and Compensation (2014) WA00021891-901	Stipulated	Disputed	FRE 402, 403, 802, F	
A-208	Washington Corrections Center Operational Memorandum: Class III Employment and Compensation (2009) WA00021902-913	Stipulated	Disputed	FRE 402, 403, 802, F	

A-209	Washington Corrections Center Operational Memorandum: Class II Employment and Compensation (2015) WA00021966-987	Stipulated	Disputed	FRE 402, 403, 802, F	
A-210	Washington Corrections Center Operational Memorandum: Class II Offender Employment (2016) WA00022003-013	Stipulated	Disputed	FRE 402, 403, 802, F	
A-211	Washington Corrections Center for Women Operational Memorandum: Class III Offender Employment (2017) WA00022191-206	Stipulated	Disputed	FRE 402, 403, 802, F	
A-212	Washington Corrections Center for Women Operational Memorandum: Class III Offender Employment (2012) WA00022221-254	Stipulated	Disputed	FRE 402, 403, 802, F	
A-213	Westlake Work Center and East Lake Work Center 2015 Payroll WA00022552	Stipulated	Disputed	FRE 402, 403, 802, F	
A-214	Westlake Work Center and East Lake Work Center 2016 Payroll WA00022553	Stipulated	Disputed	FRE 402, 403, 802, F	
A-215	Westlake Work Center and East Lake Work Center 2017 Payroll WA00022554	Stipulated	Disputed	FRE 402, 403, 802, F	
A-216	Westlake Work Center and East Lake Work Center 2018 Payroll WA00022555	Stipulated	Disputed	FRE 402, 403, 802, F	

A-219	Photographs WA00029769-71	Disputed	Disputed	FRE 901	
A-223	Letter from Attorney General of Washington, November 30, 2018. ECF 220-1	Stipulated	Disputed	FRE 402, 403, 802, F	
A-224	SCC Resident Incentive Pay WA00022539	Disputed	Disputed	FRE 402, 403, 802, F	
A-225	Declaration of Julie Williams ECF 304	Disputed	Disputed	FRE 402, 403, 802, F, MIL	
A-226	Airway Heights Correctional Facility Job Descriptions WA00020523-25	Stipulated	Disputed	FRE 402, 403, 802, F	
A-227	Cedar Creek Correctional Industries job descriptions WA00021030-59	Stipulated	Disputed	FRE 402, 403, 802, F	
A-230	Disability Rights Washington Letter, December 15, 2014 Exhibit 340 to Grice 30(b)(6) Dep.	Disputed	Disputed	FRE 402, 403, 701, 802, F	
A-231	Compilation of E-Mail Exhibit 263 to Wonhoff 30(b)(6) Dep.	Stipulated	Disputed	FRE 402, 403, 701, 802, F	
A-232	SCC Final report Exhibit 338 to Eagle 30(b)(6) Deposition	Stipulated	Disputed	FRE 402, 403, 802, F	
A-233	Declaration of Eagle Exhibit 336 to Eagle 30(b)(6) Deposition	Stipulated	Disputed	FRE 402, 403, 802, F	

Parties' Objection Codes

C. Confidential. GEO objects to the admissibility of certain confidential documents (or pages of documents), but is amenable to stipulating to their admissibility at trial, provided the confidentiality can be preserved outside of the courtroom.

F. Foundation.

MIL. The party objects based upon a MIL ruling.

T. Testimony. GEO has disputed the admissibility of certain documents, but will stipulate to their admissibility provided the witness testifies at trial and is available for cross-examination.